

ADMINISTRATIVE RECORD
BUFFALO WEAVING & BELTING SITE
BUFFALO, ERIE COUNTY, NEW YORK

Prepared for:

U. S. EPA Region II
Removal Action Branch
Edison, New Jersey 08837

Prepared by:

Region II Removal Support Team
Weston Solutions, Inc
Federal Programs Division
Edison, New Jersey 08837

DCN #: RST-02-F-01079
EPA Contract No.: 68-W-00-113

JULY 2003

SDMS Document



110155

Administrative Records in Local Repositories

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The Administrative Record file must be reasonably available for public review during normal business hours. The record file should be treated as a non-circulating reference document. This will allow the public greater access to the volumes and also minimize the risk of loss or damage. Individuals may photocopy any documents contained in the record file, according to the photocopying procedures at the local repository.

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The Administrative Record file will be maintained at the local repository until further notice. Questions regarding the maintenance of the record file should be directed to the EPA Regional Office.

The Agency welcomes comments at any time on documents contained in the Administrative Record file. Please send any such comments to Kevin Matheis, On Scene Coordinator, U.S. EPA Region II, 2890 Woodbridge Ave Edison, New Jersey 08837

For further information on the Administrative Record file contact Kevin Matheis OSC, US EPA Region II at (732) 321-6789.

BUFFALO WEAVING & BELTING SITE

ADMINISTRATIVE RECORD GUIDANCE

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BUFFALO WEAVING & BELTING SITE

ADMINISTRATIVE RECORD FILE

MODEL INDEX OF DOCUMENTS

The index of documents contains the following information about each document:

Document #:	Site Code (three letters of site name)-Section, First Page-Section - Last Page EXAMPLE (BUF1.1001 - 1.1002)
Title:	Abstract of Document Contents
Category:	Document Category/Section of Administrative Record File
Author:	Writer and affiliation
Recipient:	Addressee or Public and Affiliation, if applicable
Date:	When document was created or transmitted

Note: Items in the Administrative Record are for public access, and should be removed from the file only for copying. The cost of reproduction of the documents in the file is the responsibility of the person requesting the copy.

**BUFFALO WEAVING & BELTING SITE
ADMINISTRATIVE RECORD FILE
INDEX OF DOCUMENTS**

Document #: BUF1.4001-1.4022
Title: Analytical Data Report
Category: Site Investigation (SI) Report
Author: Waste Stream Technology, Inc.
Recipient: Buffalo Economic Renaissance Corporation
Date: April 16, 2003

Document #: BUF1.4023-1.4033
Title: EDR PUR-IQ Report
Category: Site Investigation (SI) Report
Author: Environmental Data Resources, Inc.
Recipient: Benchmark Environmental, PLLC
Date: April 17, 2003

Document #: BUF1.5001-1.5009
Title: B.P.D.E.S. Discharge Permit Application
Category: Previous Operable Unit Information
Author: Harold Stockman, V.P. & General Manager, Buffalo Weaving & Belting Company
Recipient: City of Buffalo Sewerage Authority
Date: March 6, 1991

Document #: BUF1.6001-1.6040
Title: Buffalo Weaving and Belting Site Photographs, pre-fire
Category: Photo Documentation
Author: Malcolm Pirnie, Inc.
Recipient: Buffalo Economic Renaissance Corporation
Date: April 18, 2003

Document #: BUF2.2001-2.2017
Title: Buffalo Weaving & Belting Co., Buffalo, New York
Category: Sampling and Analysis Data
Author: Michael Mahnkopf, Weston Solutions, Inc.
Recipient: Kevin Matheis, On-Scene Coordinator, U.S. Environmental Protection Agency
Date: April 22, 2003

Document #: BUF2.5001-2.5039
Title: Documentation of Verbal Authorization and Request for a Ceiling Increase for a Removal Action at the Buffalo Weaving & Belting Company Site, Buffalo, Erie County, New York
Category: Action Memorandum
Author: Kevin M. Matheis, On-Scene Coordinator, U.S. Environmental Protection Agency
Recipient: George Pavlou, Director, Emergency and Remedial Response Division
Date: May 1, 2003

Document #: BUF2.5040-2.5041
Title: Request and Documentation for the Verbal Authorization for a Removal Action at the Buffalo Weaving and Belting Co., located in Buffalo, New York
Category: Action Memorandum
Author: Kevin M. Matheis, On-Scene Coordinator, Removal Action Branch, U.S. Environmental Protection Agency
Recipient: George Pavlou, Director, Emergency and Remedial Response Division
Date: April 22, 2003

Document #: BUF2.8001
Title: Street Permit, Chandler Street between Manton Pl. and Bridgeman St.
Category: Site Permits
Author: Department of Public Works, Parks and Streets, Buffalo, New York
Recipient: U.S. Environmental Protection Agency
Date: May 7, 2003

Document #: BUF6.3001
Title: Request for CERCLA emergency response action at the former Buffalo Belt and Webbing facility
Category: State Referral Documents
Author: Salvatore Ervolina, New York State Department of Environmental Conservation, Division of Environmental Remediation
Recipient: George Pavlou, Director, Emergency and Remedial Response Division, U.S. Environmental Protection Agency
Date: April 23, 2003

Document #: BUF10.6001
Title: Update Fact Sheet, May 2003
Category: Fact Sheets and Press Releases
Author: Kevin M. Matheis, On-Scene Coordinator, U.S. Environmental Protection Agency
Recipient: Available to Public
Date: May 6, 2003

Document #: BUF10.6002
Title: Update Fact Sheet, June 2003
Category: Fact Sheets and Press Releases
Author: Kevin M. Matheis, On-Scene Coordinator, U.S. Environmental Protection Agency
Recipient: Available to Public
Date: June 9, 2003

Document #: BUF10.6003
Title: Update Fact Sheet, June 2003
Category: Fact Sheets and Press Releases
Author: Kevin M. Matheis, On-Scene Coordinator, U.S. Environmental Protection Agency
Recipient: Available to Public
Date: June 20, 2003

Document #: BUF10.6004-10.6005
Title: Closing doors: Alpha Associates to buy rest of Buffalo Weaving
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber and Plastic News
Recipient: Available to Public
Date: February 24, 2003

Document #: BUF10.6006-10.6007
Title: Weaving a sad tale
Category: Fact Sheets and Press Releases
Author: Fred O. Williams, Buffalo News
Recipient: Available to Public
Date: February 19, 2003

Document #: BUF10.6008
Title: Buffalo Weaving story sad and all too common
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber & Plastic News
Recipient: Available to Public
Date: March 10, 2003

Document #: BUF10.6009
Title: Shutdown hurts workers
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber & Plastic News
Recipient: Available to Public
Date: March 10, 2003

Document #: BUF10.6010
Title: Company veteran weathers good, bad times
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber & Plastic News
Recipient: Available to Public
Date: March 10, 2003

Document #: BUF10.6011
Title: Pharr holds on
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber and Plastic News
Recipient: Available to Public
Date: March 2003

Document #: BUF10.6012
Title: Three-alarm fire in Black Rock
Category: Fact Sheets and Press Releases
Author: John C. Hickey, Buffalo News
Recipient: Available to Public
Date: April 16, 2003

Document #: BUF10.6013
Title: Two charged with arson in fire at vacant Black Rock plant
Category: Fact Sheets and Press Releases
Author: Jay Rey, Buffalo News
Recipient: Available to Public
Date: April 20, 2003

Document #: BUF10.6014
Title: No hazards found in first tests at fire scene
Category: Fact Sheets and Press Releases
Author: Venessa Thomas, Buffalo News
Recipient: Available to Public
Date: April 22, 2003

Document #: BUF10.6015-10.6017
Title: Caught in a revolving door: Cash flow spurs Buffalo Weaving troubles
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber & Plastic News
Recipient: Available to Public
Date: April 22, 2003

Document #: BUF10.6018
Title: 111-year-old firm spans horse-drawn age to space age
Category: Fact Sheets and Press Releases
Author: Mike McNulty, Rubber & Plastic News
Recipient: Available to Public
Date: April 24, 2003

Document #: BUF10.6019
Title: Black Rock fire: Arrests Made; Dangers Assessed
Category: Fact Sheets & Press Releases
Author: Patricia Abbatoy, Riverside Review
Recipient: Available to Public
Date: April 23, 2003

Document #: BUF10.6020
Title: Buffalo defense contractor pleads guilty to charge
Category: Fact Sheets and Press Releases
Author: Buffalo Business First
Recipient: Available to Public
Date: September 7, 2001

EPA REGIONAL GUIDANCE DOCUMENTS

The following documents are available for public review at the EPA Region II Field Office, 2890 Woodbridge Avenue, Edison, New Jersey 08837 during regular business hours.

- * Glossary of EPA Acronyms.
- * Superfund Removal Procedures--Revision #3. OSWER Directive 9360.0-03B, February 1988.
- * Hazardous Waste Operations and Emergency Response.
Notice of Proposed Rule making and Public Hearings.
29 CFR Part 1910, Monday, August 10, 1987.
- * Guidance on Implementation of Revised Statutory Limits on Removal Action. OSWER Directive 9260.0-12, May 25, 1988.
- * Redelelegation of Authority under CERCLA and SARA.
OSWER Directive 9012.10, May 25, 1988.
- * Removal Cost Management Manual.
OSWER Directive 9360.0-02B, April, 1988.
- * Field Standard Operating Procedures (FSOP).
#4 Site Entry.
#6 Work Zones.
#8 Air Surveillance.
#9 Site Safety Plan.
- * Standard Operating Safety Guides -- U.S. EPA Office of Emergency and Remedial Response, July 5, 1988.
- * CERCLA Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Superfund).
- * SARA: Superfund Amendments and Reauthorization Act of 1986.
- * NCP: National Oil and Hazardous Substances Pollution Contingency Plan. - Publication No. 9200.2-14.
- * Guidance on Implementation of the "Contribute to Efficient Remedial Performance" Provision - Publication No. 9360.0-13.

Additional Guidance Documents are listed below and are available for review at the EPA Region II Removal Records Center.

- * The Role of Expedited Response Actions (EPA) Under SARA - Publication No. 9360.0-15.
- * Guidance on Non-NPL Removal Actions Involving Nationally Significant or Precedent Setting Issues - Publication No. 9360.0-19.
- * ARARS During Removal Actions - Publication No. 9360.3-02.
- * Consideration of ARARS During Removal Actions -Publication No. 9360.3-02FS.
- * Public Participation for OSCs - Community Relations and the Administrative Record - Publication No.9360.3-05.
- * Superfund Removal Procedures - Removal Enforcement Guidance for On-Scene Coordinators - Publication No. 9360.3-06.
- * QA/QC for Removal Actions - Publication No. 9360.4-01.
- * Compendium for ERT Air Sampling Procedures - Publication No. 9360.4-05.

Waste Stream Technology, Inc.

302 Grote Street
Buffalo, NY 14207
(716) 876-5290

Analytical Data Report

Group Number: 2031-873

Site: Chandler St. Samples From Fire

Field and Laboratory Information

WST ID	Client ID	Matrix	Date Sampled	Date Received	Time
WT17456	2003-26A	Aqueous	04/16/03	04/16/03	11:55
WT17457	2003-26B	Aqueous	04/16/03	04/16/03	11:55
WT17458	2003-26C	Aqueous	04/16/03	04/16/03	11:55

COPY

METHODOLOGIES

The specific methodologies employed in obtaining the analytical data reported are indicated on each of the result forms. The method numbers shown refer to the following U.S. Environmental Protection Agency Reference:

Methods for Chemical Analysis of Water and Wastes. EPA 600/4-79-020, March 1979, Revised 1983, U.S. Environmental Monitoring and Support Laboratory, Cincinnati, Ohio 45268.

Federal Register, 40 CFR Part 136: Guidelines Establishing Test Procedures for the Analysis of Pollutants Under the Clean Water Act. Revised July 1992.

Test Methods for Evaluating Solid Waste: Physical/Chemical Methods. Third Edition, Revised December 1996, U.S. EPA SW-846.

Annual Book of ASTM Standards, Volume II. ASTM, 100 Harbor Drive, West Conshohocken, PA 19428-2959.

Standard Methods for the Examination of Water and Wastewater. (20th Edition). American Public Health Association, 1105 18th Street, NW, Washington, D.C. 20036.

DETECTION LIMIT DEFINITIONS

MDL = Method Detection Limit. When reported, the MDL is the minimum concentration that can be measured and reported with 99 percent confidence that the concentration is greater than zero.

MQL = Method Quantitation Limit. The MQL is the minimum concentration that can be reliably reported. The MQL is equal to the concentration of the lowest standard used for the initial calibration of the instrument.

Reporting Limit = A reporting limit is the minimum concentration that can be measured and reported for analyses where initial calibration is not applicable. The reporting limit is based on the specifics of the analysis procedure.

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ORGANIC DATA QUALIFIERS

- U - Indicates compound was analyzed for but not detected at the stated MQL or Reporting Limit. If the MDL has been reported, U indicates that the compound was not detected at the MDL.
- J - Indicates an estimated value. This flag is used to qualify the following: when estimating a concentration for tentatively identified compounds where a 1:1 response is assumed; a compound is detected in the sample but the result is less than the method quantitation limit but greater than the statistically calculated laboratory method detection limit; the result for a compound is estimated due to the analysis of a sample beyond the USEPA defined holding time; the result for a compound is estimated due to a quality control sample result that is outside the laboratory quality control recovery limits.
- C - This flag applies to pesticide results where the identification has been confirmed by GC/MS.
- B - This flag is used when the analyte is found in the associated blank as well as the sample.
- E - This flag identifies all compounds whose concentrations exceed the calibration range of the GC/MS instrument of that specific analysis.
- D - This flag identifies all compounds identified in an analysis at a secondary dilution factor.
- G - Matrix spike recovery is greater than the expected upper limit of analytical performance.
- L - Matrix spike recovery is less than the expected lower limit of analytical performance.
- # - Indicates that a surrogate recovery was found to be outside the expected limits of analytical performance.
- \$ - Indicates that the surrogate compound was diluted out. The sample had to be diluted to obtain analytical results and a recovery could not be calculated.
- (%) - Indicates that the compound is a surrogate and that the value reported for this compound is in percent recovery. The quality control recovery limits are indicated in the detection limit or QC limits column.

COPY

Waste Stream Technology, Inc.
TCLP Metals Analysis Result Report

Site: Chandler St. Samples From Fire
Date Sampled: 04/16/03
Date Received: 04/16/03

Group Number: 2031-873
Units: mg/L
Matrix: TCLP Extract
TCLP Extraction Date: 04/16/03

WST ID: WT17456
Client ID: 2003-26A
Digestion Date: 04/17/03

Analyte	Reporting Limit	Result	Date Analyzed	Analysis Method
Arsenic by ICP	0.045	Not detected	04/17/03	SW-846 6010
Barium by ICP	0.025	0.029	04/17/03	SW-846 6010
Cadmium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Chromium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Lead by ICP	0.075	Not detected	04/17/03	SW-846 6010
Mercury by Cold Vapor	0.001	Not detected	04/18/03	SW-846 7470
Selenium by ICP	0.095	Not detected	04/17/03	SW-846 6010
Silver by ICP	0.025	Not detected	04/17/03	SW-846 6010

COPY

Waste Stream Technology, Inc.
TCLP Metals Analysis Result Report

Site: Chandler St. Samples From Fire
Date Sampled: 04/16/03
Date Received: 04/16/03

Group Number: 2031-873
Units: mg/L
Matrix: TCLP Extract
TCLP Extraction Date: 04/16/03

WST ID: WT17457
Client ID: 2003-26B
Digestion Date: 04/17/03

Analyte	Reporting Limit	Result	Date Analyzed	Analysis Method
Arsenic by ICP	0.045	Not detected	04/17/03	SW-846 6010
Barium by ICP	0.025	0.028	04/17/03	SW-846 6010
Cadmium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Chromium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Lead by ICP	0.075	Not detected	04/17/03	SW-846 6010
Mercury by Cold Vapor	0.001	Not detected	04/18/03	SW-846 7470
Selenium by ICP	0.095	Not detected	04/17/03	SW-846 6010
Silver by ICP	0.025	Not detected	04/17/03	SW-846 6010

COPY

Waste Stream Technology, Inc.
TCLP Metals Analysis Result Report

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Units: mg/L

Matrix: TCLP Extract

TCLP Extraction Date: 04/16/03

WST ID: WT17458

Client ID: 2003-26C

Digestion Date: 04/17/03

Analyte	Reporting Limit	Result	Date Analyzed	Analysis Method
Arsenic by ICP	0.045	Not detected	04/17/03	SW-846 6010
Barium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Cadmium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Chromium by ICP	0.025	Not detected	04/17/03	SW-846 6010
Lead by ICP	0.075	Not detected	04/17/03	SW-846 6010
Mercury by Cold Vapor	0.001	Not detected	04/18/03	SW-846 7470
Selenium by ICP	0.095	Not detected	04/17/03	SW-846 6010
Silver by ICP	0.025	Not detected	04/17/03	SW-846 6010

COPY

Waste Stream Technology, Inc.**TCLP Volatile Organics Analysis**

1311/8260B

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17456

Client ID: 2003-26A

TCLP Date: 04/16/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
vinyl chloride	10	Not detected		U
1,1-dichloroethene	10	Not detected		U
chloroform	10	Not detected		U
2-butanone	100	147		
1,2-dichloroethane	10	Not detected		U
carbon tetrachloride	10	Not detected		U
trichloroethene	10	Not detected		U
benzene	10	Not detected		U
tetrachloroethene	10	Not detected		U
chlorobenzene	10	Not detected		U
1,4-dichlorobenzene	10	Not detected		U
1,2-Dichloroethane-d4 (%)		97	77- 118	
Toluene-d8 (%)		103	84- 112	
Bromofluorobenzene (%)		100	79- 125	

Dilution Factor 1**COPY**

Waste Stream Technology, Inc.**TCLP Volatile Organics Analysis**

1311/8260B

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17457

Client ID: 2003-26B

TCLP Date: 04/16/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
vinyl chloride	10	Not detected		U
1,1-dichloroethene	10	Not detected		U
chloroform	10	Not detected		U
2-butanone	100	Not detected		U
1,2-dichloroethane	10	Not detected		U
carbon tetrachloride	10	Not detected		U
trichloroethene	10	Not detected		U
benzene	10	Not detected		U
tetrachloroethene	10	Not detected		U
chlorobenzene	10	Not detected		U
1,4-dichlorobenzene	10	Not detected		U
1,2-Dichloroethane-d4 (%)		98	77-118	
Toluene-d8 (%)		103	84-112	
Bromofluorobenzene (%)		102	79-125	

Dilution Factor 1**COPY**

Waste Stream Technology, Inc.

BUFI.4009

TCLP Volatile Organics Analysis

1311/8260B

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17458

Client ID: 2003-26C

TCLP Date: 04/16/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
vinyl chloride	10	Not detected		U
1,1-dichloroethene	10	Not detected		U
chloroform	10	Not detected		U
2-butanone	100	Not detected		U
1,2-dichloroethane	10	Not detected		U
carbon tetrachloride	10	Not detected		U
trichloroethene	10	Not detected		U
benzene	10	17		
tetrachloroethene	10	Not detected		U
chlorobenzene	10	Not detected		U
1,4-dichlorobenzene	10	Not detected		U
1,2-Dichloroethane-d4 (%)		102	77- 118	
Toluene-d8 (%)		105	84- 112	
Bromofluorobenzene (%)		106	79- 125	

Dilution Factor 1**COPY**

Waste Stream Technology, Inc.
8270 TCLP Semivolatile Organics
1311/8270

Site: Chandler St. Samples From Fire
 Date Sampled: 04/16/03
 Date Received: 04/16/03
 TCLP Extraction Date: 04/16/03

Group Number: 2031-873
 Units: µg/L
 Matrix: TCLP Extract

WST ID: WT17456
 Client ID: 2003-26A
 Extraction Date: 04/17/03
 Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
pyridine	20.0	Not detected		U
1,4-dichlorobenzene	20.0	Not detected		U
Total cresols(o,m & p)	60.0	290		
nitrobenzene	20.0	Not detected		U
hexachloroethane	20.0	Not detected		U
hexachlorobutadiene	20.0	Not detected		U
2,4,6-trichlorophenol	40.0	Not detected		U
2,4,5-trichlorophenol	20.0	Not detected		U
2,4-dinitrotoluene	20.0	Not detected		U
hexachlorobenzene	20.0	Not detected		U
pentachlorophenol	40.0	Not detected		U
2-Fluorophenol (%)		49	20-69	
Phenol-d6 (%)		32	13-48	
Nitrobenzene-d5 (%)		68	42-126	
2-Fluorobiphenyl (%)		74	44-133	
2,4,6-Tribromophenol (%)		81	49-144	
Terphenyl-d14 (%)		74	43-149	
Dilution Factor	2.5			

COPY

Waste Stream Technology, Inc.**8270 TCLP Semivolatile Organics****1311/8270**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17457

Client ID: 2003-26B

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	ML	Result	QC Limits (%)	Qualifier
pyridine	20.0	Not detected		U
1,4-dichlorobenzene	20.0	Not detected		U
Total cresols(o,m & p)	60.0	154		
nitrobenzene	20.0	Not detected		U
hexachloroethane	20.0	Not detected		U
hexachlorobutadiene	20.0	Not detected		U
2,4,6-trichlorophenol	40.0	Not detected		U
2,4,5-trichlorophenol	20.0	Not detected		U
2,4-dinitrotoluene	20.0	Not detected		U
hexachlorobenzene	20.0	Not detected		U
pentachlorophenol	40.0	Not detected		U
2-Fluorophenol (%)		53	20-69	
Phenol-d6 (%)		34	13-48	
Nitrobenzene-d5 (%)		74	42-126	
2-Fluorobiphenyl (%)		80	44-133	
2,4,6-Tribromophenol (%)		83	49-144	
Terphenyl-d14 (%)		78	43-149	
Dilution Factor	2.5			

COPY

Waste Stream Technology, Inc.**8270 TCLP Semivolatile Organics****1311/8270**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17458

Client ID: 2003-26C

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
pyridine	20.0	Not detected		U
1,4-dichlorobenzene	20.0	Not detected		U
Total cresols(o,m & p)	60.0	130		
nitrobenzene	20.0	Not detected		U
hexachloroethane	20.0	Not detected		U
hexachlorobutadiene	20.0	Not detected		U
2,4,6-trichlorophenol	40.0	Not detected		U
2,4,5-trichlorophenol	20.0	Not detected		U
2,4-dinitrotoluene	20.0	Not detected		U
hexachlorobenzene	20.0	Not detected		U
pentachlorophenol	40.0	Not detected		U
2-Fluorophenol (%)		56	20-69	
Phenol-d6 (%)		36	13-48	
Nitrobenzene-d5 (%)		80	42-126	
2-Fluorobiphenyl (%)		86	44-133	
2,4,6-Tribromophenol (%)		89	49-144	
Terphenyl-d14 (%)		85	43-149	
Dilution Factor	2.5			

COPY

Waste Stream Technology, Inc.**Method Blank TCLP Semivolatiles**

1311/8270

Site: Chandler St. Samples From Fire

Date Sampled: NA

Date Received: NA

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

WST ID: 0417/03

Client ID: NA

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	ML	Result	QC Limits (%)	Qualifier
Pyridine	20.0	Not detected		U
1,4-Dichlorobenzene	20.0	Not detected		U
Total Cresols(o,m,&p)	60.0	Not detected		U
Nitrobenzene	20.0	Not detected		U
Hexachloroethane	20.0	Not detected		U
Hexachlorobutadiene	20.0	Not detected		U
2,4,6-Trichlorophenol	40.0	Not detected		U
2,4,5-trichlorophenol	20.0	Not detected		U
2,4-Dinitrotoluene	20.0	Not detected		U
Hexachlorobenzene	20.0	Not detected		U
Pentachlorophenol	40.0	Not detected		U
2-Fluorophenol (%)		54	20-69	
Phenol-d6 (%)		34	13-48	
Nitrobenzene-d5 (%)		75	42-126	
2-Fluorobiphenyl (%)		78	44-133	
2,4,6-Tribromophenol (%)		82	49-144	
Terphenyl-d14 (%)		78	43-149	

Dilution Factor 1

MB denotes Method Blank

NA denotes Not Applicable

COPY

Waste Stream Technology, Inc.**TCLP Pesticide Analysis**

1311/8081

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17456

Client ID: 2003-26A

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
chlordane	2.00	Not detected		U
endrin	0.100	Not detected		U
gamma-BHC (Lindane)	0.100	Not detected		U
heptachlor	0.100	Not detected		U
heptachlor epoxide	0.100	Not detected		U
methoxychlor	0.100	Not detected		U
toxaphene	2.50	Not detected		U
Tetrachloro-m-xylene (%)		83	72-117	
Decachlorobiphenyl (%)		98	71-123	
Dilution Factor	2.5			

COPY

Waste Stream Technology, Inc.

BUF1.4015

TCLP Pesticide Analysis

1311/8081

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17457

Client ID: 2003-26B

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
chlordane	2.00	Not detected		U
endrin	0.100	Not detected		U
gamma-BHC (Lindane)	0.100	Not detected		U
heptachlor	0.100	Not detected		U
heptachlor epoxide	0.100	Not detected		U
methoxychlor	0.100	Not detected		U
toxaphene	2.50	Not detected		U
Tetrachloro-m-xylene (%)		91	72-117	
Decachlorobiphenyl (%)		95	71-123	

Dilution Factor 2.5**COPY**

Waste Stream Technology, Inc.**TCLP Pesticide Analysis**

1311/8081

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

Matrix: TCLP Extract

WST ID: WT17458

Client ID: 2003-26C

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	MQL	Result	QC Limits (%)	Qualifier
chlordane	2.00	Not detected		U
endrin	0.100	Not detected		U
gamma-BHC (Lindane)	0.100	Not detected		U
heptachlor	0.100	Not detected		U
heptachlor epoxide	0.100	Not detected		U
methoxychlor	0.100	Not detected		U
toxaphene	2.50	Not detected		U
Tetrachloro-m-xylene (%)		102	72-117	
Decachlorobiphenyl (%)		108	71-123	
Dilution Factor	2.5			

COPY

Waste Stream Technology, Inc.

Method Blank for TCLP Pesticides

1311/8081

Site: Chandler St. Samples From Fire

Date Sampled: NA

Date Received: NA

TCLP Extraction Date: 04/16/03

Group Number: 2031-873

Units: µg/L

WST ID: MB041703

Client ID: NA

Extraction Date: 04/17/03

Date Analyzed: 04/17/03

Compound	ML	Result	QC Limits (%)	Qualifier
Chlordane	2.00	Not detected		U
Endrin	0.100	Not detected		U
Gamma-BHC (Lindane)	0.100	Not detected		U
Heptachlor	0.100	Not detected		U
Heptachlor Epoxide	0.100	Not detected		U
Methoxychlor	0.100	Not detected		U
Toxaphene	2.50	Not detected		U
Tetrachloro-m-xylene (%)		98	72-117	
Decachlorobiphenyl (%)		97	71-123	

Dilution Factor *2.5*

MB denotes Method Blank

NA denotes Not Applicable

COPY

Waste Stream Technology, Inc.**Ignitability (flash point)****SW-846 1010**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Matrix: Aqueous

Units: ° F

WST ID	Client ID	Reporting Limit	Result	Date Analyzed
WT17456	2003-26A	NA	>200	04/17/03
WT17457	2003-26B	NA	>200	04/17/03
WT17458	2003-26C	NA	>200	04/17/03

> 200 = no flash detected at a temperature up to 200 degrees Fahrenheit.

COPY

Waste Stream Technology, Inc.**pH in Water****EPA 150.1**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Matrix: Aqueous

Units: pH Units

WST ID	Client ID	Reporting Limit	Result	Date Analyzed
WT17456	2003-26A	NA	7.27	04/17/03
WT17457	2003-26B	NA	7.54	04/17/03
WT17458	2003-26C	NA	7.60	04/17/03

According to the NYSDOH, pH analyses not performed within 15 minutes need to be reported as "over-aged".

COPY

Waste Stream Technology, Inc.**Section 7.3.3.2 Reactive Cyanide****SW-846 9014**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Matrix: Aqueous

Units: mg/L

WST ID	Client ID	Reporting Limit	Result	Date Analyzed
WT17456	2003-26A	40.0	Not detected	04/17/03
WT17457	2003-26B	40.0	Not detected	04/17/03
WT17458	2003-26C	40.0	Not detected	04/17/03

COPY

Waste Stream Technology, Inc.**Section 7.3.4.2 Reactive Sulfide****SW-846 9034**

Site: Chandler St. Samples From Fire

Date Sampled: 04/16/03

Date Received: 04/16/03

Group Number: 2031-873

Matrix: Aqueous

Units: mg/L

WST ID	Client ID	Reporting Limit	Result	Date Analyzed
WT17456	2003-26A	40.0	Not detected	04/17/03
WT17457	2003-26B	40.0	Not detected	04/17/03
WT17458	2003-26C	40.0	Not detected	04/17/03

COPY

CHAIN OF CUSTODY

REPORT TO:
Buffalo Economic Revitalization
Corp. 617 CHRY ST
Buffalo NY 14203
Robert A. Schiavelli
 CONTACT
716 871-2412
 PH. # ()
716-871-C998
 FAX # ()
31910
 BILL TO:
 PO# Columbia ST
Scotch Lane Park
 PROJECT DESCRIPTION
Rock Pile
 SAMPLER SIGNATURE

WASTE STREAM

TECHNOLOGY

Waste Stream Technology Inc.
 302 Grote Street, Buffalo, NY 14207
 (716) 876-5290 • FAX (716) 876-2412

OFFICE USE ONLY

GROUP # 8031-873

DUE DATE _____

TURN AROUND TIME:
Standard 3 DAY

QUOTATION NUMBER: 9116/03

PAGE _____ OF _____

ARE SPECIAL DETECTION LIMITS
 REQUIRED:
 YES NO
 If yes please attach requirements.

Is a QC Package required:
 YES NO
 If yes please attach requirements

DW DRINKING WATER
 GW GROUND WATER
 SW SURFACE WATER
 WW WASTE WATER
 O OIL
 SL SLUDGE
 SO SOIL
 S SOLID
 W WIPE
 OTHER

ANALYSES TO BE PERFORMED

SAMPLE I.D.	DATE SAMPLED	TIME OF SAMPLING	SAMPLE TYPE	TOTAL NO. OF CONTAINERS	ANALYSES TO BE PERFORMED										TYPE OF CONTAINER/ COMMENTS:	OFFICE USE ONLY WST. I.D.
					Full TCLP	BCRA CHAP.										
1	2003-2-5	10:30	WW	1	X										Arch AREA WST 1496	
2	"	"	WW	1	X										10 mill D	1 97
3	"	"	WW	1	X										mill 8	1 98
4																
5																
6																
7																
8																
9																
10																

REMARKS: 1st copy of Report To NYS D&E Mike Pranks 716-851-7452
ORTECH Linda Scott 716-813-7807

RELINQUISHED BY:

DATE:

TIME:

RECEIVED BY:

DATE:

TIME:

RELINQUISHED BY:

DATE:

TIME:

RECEIVED BY:

DATE:

TIME:

BUFI 4022

Fax To: Benchmark Environmental, PLLC
Contact: Bryan Hann
Fax : 716-856-0583
Date: 04/17/2003

Fax From: Erik Terranova
EDR
Phone: 1-800-352-0050

EDR PUR-IQ[®] Report

"the intelligent way to conduct historical research"

for
Buffalo Weaving and Belting Co
260 Chandler Street
Buffalo, NY 14207
Lat./Long. 42.94350 / 78.88520
EDR Inquiry # 0962135.1s

The EDR PUR-IQ report facilitates historical research planning required to complete the Phase I ESA process. The report identifies the *likelihood* of prior use coverage by searching EDR's proprietary historical source(s) database comprising nationwide information on: city directories, fire insurance maps, aerial photographs, historical topographic maps, flood maps and National Wetland Inventory maps.

Potential for EDR Historical (Prior Use) Coverage - Coverage in the following historical information sources may be used as a guide to develop your historical research strategy:

- 1. City Directory:** Coverage exists for portions of BUFFALO, NY for 1959, 1998, 61, 62, 64-68, 70-77, 82, 85, 86, 87, 90, 92
- 2. Fire Insurance Map:** When you order online any ASTM 2000 Package, or an EDR Radius Map with a Sanborn Map Search/Print, you receive site specific Sanborn Map coverage information at no charge.
- 3. Aerial Photograph:** 1959, 1966, 1978, 1980, 1981, 1982, 1983, 1994, 1995 Shipping time 3-5 business days.
- 4. Topographic Map:** The USGS 7.5 min. quad topo sheet(s) associated with this site:

Historical: Coverage exists for Erie County

Current: Target Property: 2442078-H8 Buffalo NW, NY CA10

Additional required for 1 Mile radius: 2442078-H7 Buffalo NE, NY

EDR's network of professional researchers, located throughout the United States, accesses the most extensive national collections of city directory, fire insurance maps, aerial photographs and historical topographic map resources available for Buffalo, NY. These collections may be located in multiple libraries throughout the country. To ensure maximum coverage, EDR will often assign researchers at these multiple locations on your behalf. Please call or fax your EDR representative to authorize a search.



The EDR Radius Map with GeoCheck®

**Buffalo Weaving and Belting Co
260 Chandler Street
Buffalo, NY 14207**

Inquiry Number: 0962135.1s

April 17, 2003

The Source For Environmental Risk Management Data

**3530 Post Road
Southport, Connecticut 06890**

Nationwide Customer Service

**Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com**

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

260 CHANDLER STREET
BUFFALO, NY 14207

COORDINATES

Latitude (North): 42.943500 - 42° 56' 36.6"
Longitude (West): 78.885200 - 78° 53' 6.7"
Universal Transverse Mercator: Zone 17
UTM X (Meters): 672539.4
UTM Y (Meters): 4756495.5

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: 2442078-H8 BUFFALO NW, NY CA10
Source: USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
CERC-NFRAP..... CERCLIS No Further Remedial Action Planned
CORRACTS..... Corrective Action Report
RCRIS-TSD..... Resource Conservation and Recovery Information System
RCRIS-LQG..... Resource Conservation and Recovery Information System
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SWF/LF..... Facility Register

EXECUTIVE SUMMARY

CBS UST	Chemical Bulk Storage Database
MOSF UST	Major Oil Storage Facilities Database
SWTIRE	Registered Waste Tire Storage & Facility List
SWRCY	Registered Recycling Facility List

FEDERAL ASTM SUPPLEMENTAL

CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
Delisted NPL	National Priority List Deletions
FINDS	Facility Index System/Facility Identification Initiative Program Summary Report
HMIRS	Hazardous Materials Information Reporting System
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
NPL Liens	Federal Superfund Liens
PADS	PCB Activity Database System
RAATS	RCRA Administrative Action Tracking System
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
SSTS	Section 7 Tracking Systems
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

HSWDS	Hazardous Substance Waste Disposal Site Inventory
AST	Petroleum Bulk Storage
CBS AST	Chemical Bulk Storage Database
MOSF AST	Major Oil Storage Facilities Database

BROWNFIELDS DATABASES

Brownfields	Brownfields Site List
--------------------------	-----------------------

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

FEDERAL ASTM STANDARD

CERCLIS: The Comprehensive Environmental Response, Compensation and Liability Information System contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 03/19/2003 has revealed that there are 2 CERCLIS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
HERTEL AVE	S HERTEL RD 1000FTW MIL	1/4 - 1/2 NW	26	95
MORGAN CHEMICALS INC	373 HERTEL AVE	1/4 - 1/2 WNW	37	118

RCRIS: The Resource Conservation and Recovery Act database includes selected information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. The source of this database is the U.S. EPA.

A review of the RCRIS-SQG list, as provided by EDR, and dated 09/09/2002 has revealed that there are 10 RCRIS-SQG sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
QUALITY PETROLEUM PRODUCTS INC	164 CHANDLER ST	0 - 1/8 SW	A3	66
COMBINED SUPPLY & EQUIPMENT CO	215 CHANDLER ST	0 - 1/8 E	14	80
BUFFALO WEAVING & BELTING CO	260 CHANDLER ST	1/8 - 1/4 E	D15	80
WASTE STREAM TECHNOLOGY INC	302 GROTE ST	1/8 - 1/4 ESE	17	83
GEM-COR	601 AMHERST ST	1/8 - 1/4 SE	E19	90
PERSONNEL CONTRACTORS	601 AMHERST ST SE 1ST F	1/8 - 1/4 SE	E21	91
MORRISON INDUSTRIES L P	601 AMHERST ST	1/8 - 1/4 SE	E22	91
DESIGN FOR INDUSTRY	601 AMHERST	1/8 - 1/4 SE	E23	93
MOHAWK INDUSTRIES INC	601 AMHERST ST - SW COR	1/8 - 1/4 SE	E24	94
WEGMANS FOOD MARKETS	601 AMHERST ST	1/8 - 1/4 SE	E25	94

STATE ASTM STANDARD

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Department of Environmental Conservation's Inactive Hazardous waste Disposal Sites in New York State.

A review of the SHWS list, as provided by EDR, has revealed that there are 2 SHWS sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
ANACONDA COMPANY/AMERICAN BRAS	446 MILITARY ROAD	1/4 - 1/2 NW	38	119
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
MARCON ERECTORS INC	1 HOWELL ST	1/4 - 1/2 S	30	100

EXECUTIVE SUMMARY

LTANKS: Leaking Storage Tank Incident Reports. These records contain an inventory of reported leaking storage tank incidents reported from 4/1/86 through the most recent update. They can be either leaking underground storage tanks or leaking aboveground storage tanks. The causes of the incidents are tank test failures, tank failures or tank overfills

A review of the LTANKS list, as provided by EDR, and dated 01/01/2002 has revealed that there are 10 LTANKS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
NIAGARA LUBRICANTS	164 CHANDLER STREET	0 - 1/8 SW	A1	6
CITY OF BUFFALO PD	669 HERTEL AVENUE	1/4 - 1/2 NNE	27	95
GIOIA PASTA	1700 ELMWOOD AVE	1/4 - 1/2 E	28	96
SMITH METAL ARTS CO INC	1721 ELMWOOD AVE	1/4 - 1/2 E	29	98
NOCO ENERGY	357 MILITARY ROAD	1/4 - 1/2 NW	31	103
CITY SERVICE TAXI	1056 GRANT STREET	1/4 - 1/2 WSW	32	106
CITGO	1602 ELMWOOD AVENUE	1/4 - 1/2 ESE	33	107
MOD-PAC CORP	1801 ELMWOOD AVE	1/4 - 1/2 ENE	34	108
CURBELL INC	777 HERTEL AVE	1/4 - 1/2 NE	35	113
AMERICAN BRASS	70 SAYRE AVENUE	1/4 - 1/2 NW	36	116

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Conservation's Petroleum Bulk Storage (PBS) Database

A review of the UST list, as provided by EDR, and dated 01/01/2002 has revealed that there are 3 UST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
NIAGARA LUBRICANT CO INC	164 CHANDLER STREET	0 - 1/8 SW	A2	8
PHARGO, LLC DBA BUFFALO WEAVING	260 CHANDLER ST	1/8 - 1/4 E	D16	81
GAS STATION	600 AMHERST ST	1/8 - 1/4 SE	E18	87

NY VCP: Voluntary Cleanup Agreements. The voluntary remedial program uses private monies to get contaminated sites remediated to levels allowing for the sites' productive use. The program covers virtually any kind of site and contamination.

A review of the VCP list, as provided by EDR, and dated 03/03/2003 has revealed that there is 1 VCP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
601 AMHERST STREET	601 AMHERST STREET	1/8 - 1/4 SE	E20	90

STATE OR LOCAL ASTM SUPPLEMENTAL

SPILLS: Data collected on spills reported to NYSDEC, is required by one or more of the following: Article 12 of the Navigation Law, 6 NYCRR Section 613.8 (from PBS regs), or 6 NYCRR Section 595.2 (from CBS regs). It includes spills active as of April 1, 1986, as well as spills occurring since this date.

A review of the NY Spills list, as provided by EDR, has revealed that there are 12 NY Spills sites

EXECUTIVE SUMMARY

within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
NIAGARA LUBRICANTS	164 CHANDLER STREET	0 - 1/8 SW	A1	6
NIAGARA LUBRICANT CO INC	164 CHANDLER STREET	0 - 1/8 SW	A2	8
G & R MACHINE & EQUIP.	155 CHANDLER STREET	0 - 1/8 WSW	A4	67
G AND R MACHINERY	155 CHANDLER STREET	0 - 1/8 WSW	A5	68
BAKERY SALVAGE	CHANDLER STREET	0 - 1/8 SW	B6	69
SALVAGES	CHANDLER STREET	0 - 1/8 SW	B7	70
TRUCK AT OLD BAKERY SALVA	CHANDLER STREET	0 - 1/8 SW	B8	72
NIAGARA LUBRICANT	142 CHANDLER	0 - 1/8 WSW	C9	73
K R K AUTO & BODY CENTER	140 CHANDLER STREET	0 - 1/8 W	C10	75
FIRE AT BAKERY SALVAGE	138 CHANDLER STREET	0 - 1/8 W	C11	76
BAKERY SALVAGE	132 CHANDLER STREET	0 - 1/8 W	C12	77
BAKERY SALVAGE	130 CHANDLER	0 - 1/8 W	C13	78

PROPRIETARY DATABASES

Former Manufactured Gas (Coal Gas) Sites:

The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative

A review of the Coal Gas list, as provided by EDR, has revealed that there is 1 Coal Gas site within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
PEOPLES GASLIGHT & COKE CO.	BRADLEY & DART	1/2 - 1 SSW	39	121

BROWNFIELDS DATABASES

NY VCP: Voluntary Cleanup Agreements. The voluntary remedial program uses private monies to get contaminated sites remediated to levels allowing for the sites' productive use. The program covers virtually any kind of site and contamination.

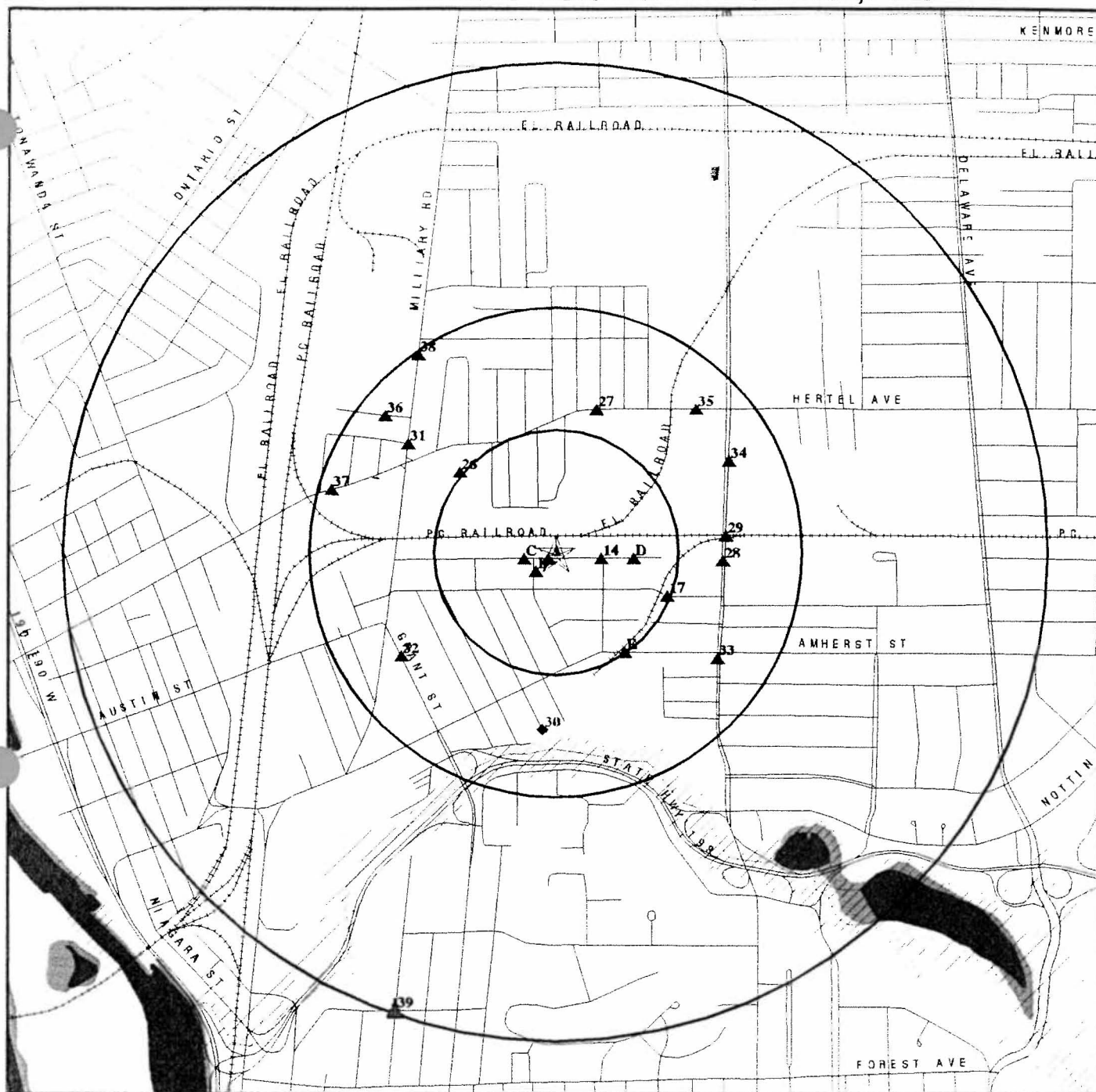
A review of the VCP list, as provided by EDR, and dated 03/03/2003 has revealed that there is 1 VCP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
601 AMHERST STREET	601 AMHERST STREET	1/8 - 1/4 SE	E20	90

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
BUFFALO POLICE RADIO TOWE	LTANKS
UNKNOWN TRUCK	LTANKS
BUFFALO FIRE HOUSE #10	LTANKS
BUFFALO GENERAL HOSPITAL	LTANKS
BUFFALO FIRE HOUSE #26	LTANKS
B M H A - JASPER PARRISH BLOCK 1	RCRIS-SQG, FINDS
WBEN RADIO	RCRIS-SQG, FINDS
NYSDOT BIN 1-02273-0	FINDS, RCRIS-LQG
NYSDOT BIN 1-02261-0	FINDS, RCRIS-LQG
NYSDOT BIN 1-02277-0	FINDS, RCRIS-LQG
NYSDOT BIN 1-02271-0	FINDS, RCRIS-LQG
BRENTON - BLUE LIQUID	NY Spills
TAR ON ROAD	NY Spills
CITY OF BFLO PARKS DEPT	NY Spills
WARD TRUCKING	NY Spills
UPS/BUFFALO NIAGARA AIRPO	NY Spills
SUNY AT BUFFALO	NY Spills
BUFFALO RIVER	NY Spills
BUFFALO RIVER	NY Spills
BUFFALO RIVER DISCHARGE	NY Spills
BUFFALO FIRE HOUSE #22	NY Spills
BUFFALO STREETS & SANITAT	NY Spills
BOAT SUNK BUFFALO HARBOR	NY Spills
BUFFALO STATE COLLEGE	NY Spills
BUFFALO RIVER/ CROSSROADS	NY Spills
SHEEN ON BUFFALO RIVER	NY Spills
ASHLAND OIL HAZ WASTE SIT	NY Spills
CITY OF BUFFALO	NY Spills
BARGE BUFFALO RIVER	NY Spills
FIRE ENGINE #13 FIRE DEPT	NY Spills
BUFFALO SEWER AUTHORITY	NY Spills
BUFFALO PUBLIC SCHOOL	NY Spills
BUFFALO FUEL TRUCK	NY Spills
BUFFALO FOUNDRY	NY Spills
BUFFALO NAVAL SERV. PARK	NY Spills
CITY OF BUFFALO	NY Spills
BUFFALO RIVER	NY Spills
OIL ON BUFFALO RIVER	NY Spills
CITY OF BUFFALO TRUCK	NY Spills
BUFFALO WESTSIDE POST OFC	NY Spills
BUFFALO STATE COLLEGE	NY Spills
SAFETY KLEEN CORP.	NY Spills
CONRAIL	NY Spills
TRUCK ACCIDENT	NY Spills
BUFFALO AND PITTSBURGH RR	NY Spills
SHEEN ON SCAJAQUADA	NY Spills
MARCON ERECTORS	NY Spills
OIL ON BUFFALO RIVER	NY Spills
SUNY AT BUFFALO	NY Spills
BUFFALO INNER HARBOR	NY Spills
BUFFALO RIVER	NY Spills
NATIONAL RECYCLING TRUCK	NY Spills
BUFFALO RAILROAD	NY Spills
SCAJAQUADA CREEK	NY Spills
SUNY BUFFALO NORTH CAMPUS	NY Spills
BUFFALO NEWS	NY Spills



★ Target Property

▲ Sites at elevations higher than or equal to the target property

◆ Sites at elevations lower than the target property

▲ Coal Gasification Sites

□ National Priority List Sites

□ Landfill Sites

County Boundary

Power transmission lines

Oil & Gas pipelines

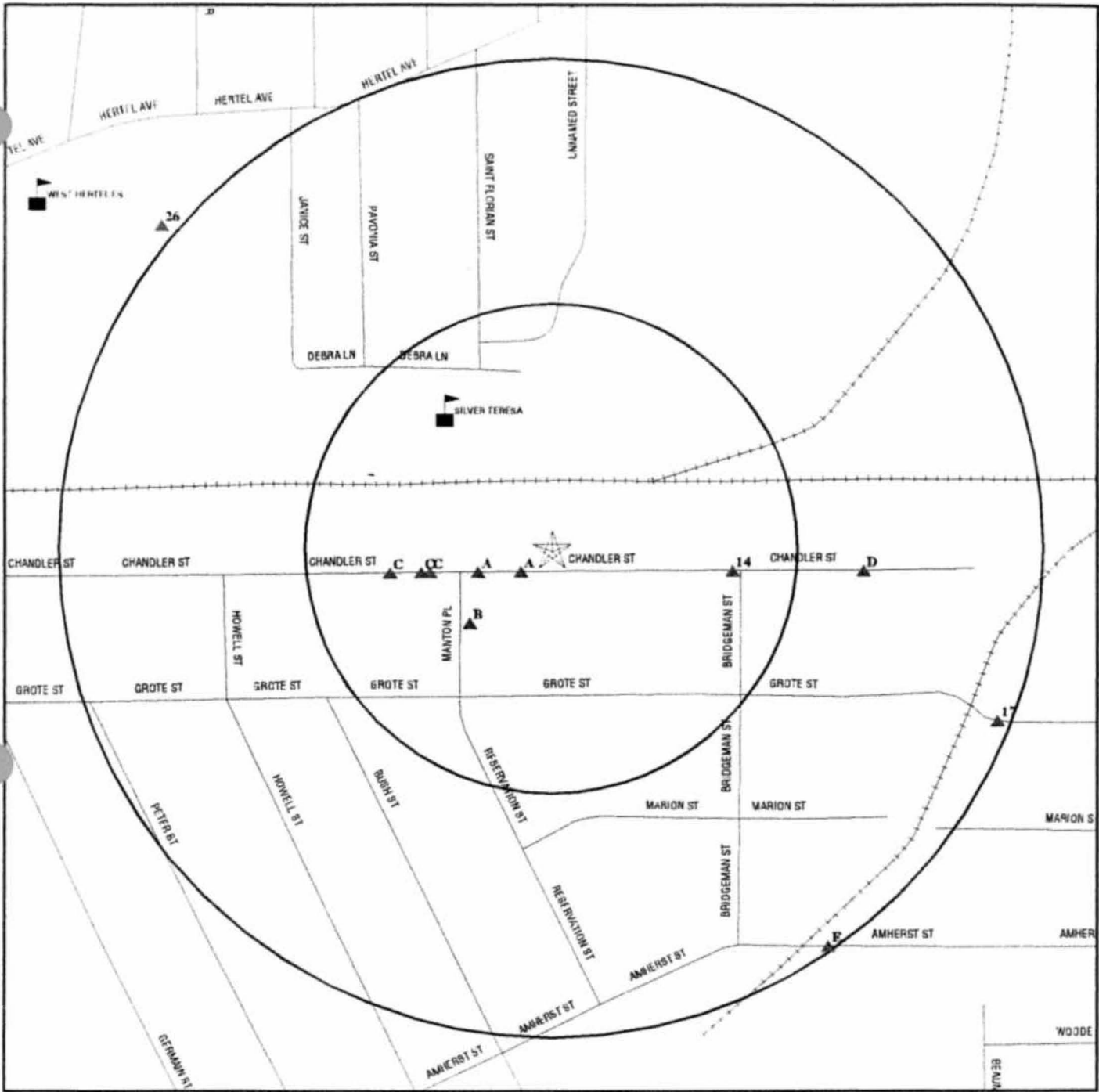
100-year flood zone

500-year flood zone

Wetlands

TARGET PROPERTY: Buffalo Weaving and Belting Co
ADDRESS: 260 Chandler Street
CITY/STATE/ZIP: Buffalo NY 14207
LAT/LONG: 42.9435 / 78.8852

CUSTOMER: Benchmark Environmental, PLLC
CONTACT: Bryan Hann
INQUIRY #: 0962135.1s
DATE: April 17, 2003 6:14 pm



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- County Boundary
- Power transmission lines
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone

TARGET PROPERTY: Buffalo Weaving and Belting Co ADDRESS: 250 Chandler Street CITY/STATE/ZIP: Buffalo NY 14207 LAT/LONG: 42.9435 / 78.8852	CUSTOMER: Benchmark Environmental, PLLC CONTACT: Bryan Hann INQUIRY #: 0962135.1s DATE: April 17, 2003 6:15 pm
--	---

FOR BSA USE ONLY:

Date Application Rec'd.: 2-7-51

Permit Number:

SIC Numbers:

Investigator:

PART A - GENERAL INFORMATION

B.P.D.E.S. DISCHARGE PERMIT APPLICATION

- A1. Applicant Business Name Buffalo Weaving & Belting Company
- A2. Address of premises discharging wastewater:
260 Chandler Street, Buffalo, NY 14207
Street City State Zip
- Assessor's Map and Tax Lot Number: _____
- A3a. Business Address (if different than above):

Street City State Zip
- b. Mailing Address (if different than above):

Street City State Zip
- A4. Chief Business Official:
Name: Harold Stockman Title: V.P. & General Manager
Mailing Address: 260 Chandler Street, Buffalo, NY 14207
Street City State Zip
- A5. Person to be contacted about this application:
Name: John Stephens Title: Plant Engineer Phone: _____
- A6. Person to be contacted in case of emergency: Name: John Stephens
Title: Plant Engineer Day Phone: 875-7223 Night Phone: 833-5316
- A7. Confidentiality:
Please indicate those sections of this questionnaire that you wish to remain confidential and your basis for requiring confidentiality.

I have personally examined and am familiar with the information submitted in this document and attachments. Based upon my inquiry of those individuals immediately responsible for obtaining the information reported herein, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information.

March 6 1991
Date

Handel Stokren V.D.
Signature of Official (Seal if Applicable)

PART B - BUSINESS DESCRIPTION

PURPOSE - The business description is primarily used to determine the substances which may enter into the wastewater discharge from the business activity.

B1. Brief Description: Textile Webbing & Mechanical Rubber Manufacturers

B2. Business Activity: Standard Industrial Classification (SIC) Codes for Principal Products or Services:

<u>Activity</u>	<u>SIC Code (4 Digits)</u>	<u>Production (Monthly Avg.)*</u>
Mechanical Rubber Goods	3052	114.597 lbs

Woven Belt	229 2241	35.641 lbs
------------	---------------------	------------

B3. Is there a scheduled shutdown? Yes XX No If yes, when? July

B4. Is production seasonal? Yes___ No XX If yes, explain, indicating month(s) of peak production:

B5. Average number of employees per shift: 1st 50 2nd 0 3rd 0

Shift start times: 1st 7:00 am 2nd 3rd

Shift end times: 1st 3:30 pm 2nd 3rd

Shifts normally worked each day:

	<u>Sun.</u>	<u>Mon.</u>	<u>Tue.</u>	<u>Wed.</u>	<u>Thu.</u>	<u>Fri.</u>	<u>Sat.</u>
1st		X	X	X	X	X	
2nd							
3rd							

* Monthly average stated shall be the highest monthly average production in the previous five years.

PART C - WATER SOURCE AND USE

PURPOSE - The Water Source and Use information will enable BSA to determine the Volumes and Sources of wastewater discharged to the BSA sewer.

WATER/WASTEWATER DATA

C1.	Water Sources	Avg. Volume (Gallons per Day)	Peak Flow/Est'd. Duration (Gallons per Minute/Time)
	Municipal System	<u>35,000</u>	<u>Continuous</u>
	Recycled	<u>90,000</u>	<u>"</u>
	Private Wells	<u>-</u>	<u>"</u>
	Other (Specify) _____	<u>-</u>	<u>"</u>
C2.	Water Usage	Avg. Volume (Gallons per Day)	Peak Flow/Est'd. Duration (Gallons per Minute/Time)
	Cooling Water	<u>100,000</u>	<u>Continuous</u>
	Boiler Makeup	<u>1,000</u>	<u>"</u>
	Process Water	<u>0</u>	<u>"</u>
	Sanitary Purposes	<u>3,500</u>	<u>"</u>
	Other (Specify) _____	<u>1,000</u>	<u>"</u>
C3.	Water Discharge/Retention	Avg. Discharge (Gallons per Day)	Peak Discharge/Est'd Duration (Gallons per Minute/Time)
	Municipal Sewer/Sanitary		
	- Process	<u>0</u>	<u>Continuous</u>
	- Sanitary	<u>3,500</u>	<u>"</u>
	- Cooling	<u>20,000</u>	<u>"</u>
	Natural Receiving Water/ Storm Drain	<u>0</u>	
	Waste Hauler	<u>0</u>	
	Evaporation	<u>400</u>	
	Contained in Product	<u>0</u>	
	Recycled	<u>200</u>	
	Other (Specify) <u>Humidifiers</u>	<u>600</u>	
	Boiler <u>Blowdown</u>		
C4.	Is your facility permitted to discharge liquid wastes under a State (S.P.D.E.S.) or Federal (N.P.D.E.S.) permit? Yes <u> </u> No <u>x</u> Permit No. _____		
C5.	Does your facility have sources of possible emissions to the atmosphere? Yes <u>x</u> No <u> </u>		
C6.	Enter location and facility code as shown on your Air Pollution Control Application for permits and certifications (if applicable): <u>PGM-Code: A1</u>		

PART D - SUBSTANCES OF CONCERN

(REFER TO ATTACHED TABLE I)

Complete all information for those substances your facility has used, produced, stored, distributed or otherwise disposed of since last application. Do not include chemicals used only in analytical laboratory work. Enter the name and code from Table I. If facility uses a substance in any of the Classes A-M which is not specified in the list, enter it as code class plus 99, e.g. B99 with name, usage, etc.

[illegible]

TABLE I - SUBSTANCES OF CONCERN

CLASS A - HALOGENATED HYDROCARBONS

A01. Methyl chloride
 A02. Methylene chloride
 A03. Chloroform
 A04. Carbon tetrachloride
 A05. Freon/Genatron
 A06. Other halomethanes
 A07. 1, 1, 1-Trichlorethane
 A08. Other haloethanes
 A09. Vinyl fluoride
 A10. Vinyl chloride
 A11. Dichloroethylene
 A12. Trichloroethylene
 A13. Tetrachloroethylene
 A14. Chlorinated propane
 A15. Chlorinated propene
 A16. Hexachlorobutadiene
 A17. Hexachlorocyclopentadiene
 A18. Chlorinated benzene
 A19. Chlorinated toluene
 A20. Fluorinated toluene
 A21. Polychlorinated biphenyl (PCB)
 A22. Chlorinated naphthalene
 A23. Dechlorane (C₁₀Cl₁₂)
 A99. Halogenated hydrocarbons not specified above

CLASS D - AROMATIC HYDROCARBONS

D01. Benzene
 D02. Toluene
 D03. Xylene
 D04. Biphenyl
 D05. Naphthalene
 D06. Ethylbenzene
 D07. Styrene
 D08. Acenaphthene
 D09. Fluoranthene
 D99. Aromatic hydrocarbons not specified above

CLASS E - TARS

E01. Coal tar

CLASS B - HALOGENATED ORGANICS
(other than hydrocarbons)

B01. Phosgene
 B02. Methyl chloromethyl ether
 B03. bis-chloromethyl ether
 B04. Other chloroalkyl ethers
 B05. Benzoyl chloride
 B06. Chlorothymol
 B07. Chlorinated phenol
 B08. Chlorinated cresols or xylenols
 B09. Chlorendic acid
 B10. Chloraryl ethers
 B11. Dichlorophene or hexachlorophene
 B12. Chlorinated aniline (including methylene bis (2-chloroaniline))
 B13. Dichlorobenzidine
 B14. Chlorinated diphenyl oxide
 B15. Chlorinated toluidine
 B16. Kepone (C₁₀Cl₁₀O)
 B17. Dichlorovinyl sulfonyl pyridine
 B18. Chloropicrin
 B20. Trichloro-propylsulfonyl pyridine
 B21. Tetrachloro-methylsulfonyl pyridine
 B22. Tetrachloro-isophthalonitrile
 B99. Halogenated organics not specified above

CLASS G - MISCELLANEOUS

G01. Asbestos
 G02. Acrolein
 G03. Acrylonitrile
 G04. Isophorone
 G05. Nitrosamines
 G06. Ethyleneimine
 G07. Propiolactone
 G08. Nitrosodimethylamine
 G09. Dimethyl hydrazine
 G10. Maleic anhydride
 G11. Methyl isocyanate
 G12. Epoxides
 G13. Nitrofurans
 G14. Cyanide

CLASS C - PESTICIDES (including herbicides, algacides, biocides, slimicides and mildewcides)

C01. Aldrin/Dieldrin
 C02. Chlordane and metabolites
 C03. DDT and metabolites
 C04. Endosulfan/Thiodan and metabolites
 C05. Endrin and metabolites
 C06. Heptachlor and metabolites
 C07. Malathion
 C08. Methoxychlor
 C09. Parathion
 C10. Toxaphene
 C11. Sevin
 C12. Kelthane
 C13. Diazinon
 C15. Carbaryl
 C16. Silvex
 C17. Dithiocarbamates
 C18. Maneb
 C19. Dioxathion
 C20. Tandex/Karbutilate
 C21. Carbofurans
 C22. Pentac
 C23. Folpet
 C24. Dichlone
 C25. Rotenone
 C26. Lindane/Isotox
 C27. Simazine
 C28. Methoprene
 C99. Pesticides not specified above

CLASS M - METALS AND THEIR COMPOUNDS

M01. Antimony	M07. Lead	M13. Zinc
M02. Arsenic	M08. Mercury	M14. Boron
M03. Beryllium	M09. Nickel	M15. Manganese
M04. Cadmium	M10. Selenium	M99. Metals not specified above
M05. Chromium	M11. Silver	
M06. Copper	M12. Thallium	

CLASS F - SUBSTITUTED AROMATICS
(other than hydrocarbons and non-halogenated)

F01. Phenol, cresol, or xenol
 F02. Catechol, resorcinol, or hydroquinone
 F03. Nitrophenols
 F04. Nitrobenzenes
 F05. Nitrotoluenes
 F06. Aniline
 F07. Toluidines
 F08. Nitroanilines
 F09. Nitroanisole
 F10. Toluene diisocyanate
 F11. Dimethylaminoazobenzene
 F12. Benzoic Acid (and Benzoate salts)
 F13. Phthalic, isophthalic or terephthalic acid
 F14. Phthalic anhydride
 F15. Phthalate esters
 F16. Phenoxyacetic acid
 F17. Phenylphenols
 F18. Nitrobiphenyls
 F19. Aminobiphenyls (including benzidine)
 F20. Diphenylhydrazine
 F21. Naphthylamines
 F22. Carbazole
 F23. Acetylaminofluorene
 F24. Dyes and organic pigments
 F25. Pyridine
 F99. Substituted aromatics not specified above

If you use chemicals of unknown composition, list trade name or other identification, name of supplier and complete information.

Name of Substance	Average Annual Usage	Amount Now on Hand	Supplier	Purpose of Use (State whether produced, reacted, blended, packaged, distributed, no longer used)

PART E

E1. Do you have automatic sampling equipment or continuous wastewater flow metering equipment currently in use or included in future plans?

Current: Flow Metering Yes___ No X Sampling Equipment Yes___ No X

Planned: Flow Metering Yes___ No X Sampling Equipment Yes___ No X

E2. Does your facility pretreat any wastewater prior to discharge to a sanitary sewer? Yes___ No___

If so, please show locations of pretreatment processes on attached schematic process diagram (PART F) and describe below: _____

E3. Do you have a spill prevention, containment and control plan (SPCC) for your plant? Yes___ No___

E4. Do you generate any liquid or solid waste such as solvents, electroplating sludges, thinners, oils, still bottoms, fly ash, filler, etc? Yes X No___ If yes, please fill out the following table.

Type of Waste	If this waste is produced by pretreatment check here	Amount per Year (Specify lbs, Tons or Gals)	Method of Disposal (Check One & Describe Below)				
			On-Site	Municipal Landfill	Hazardous Waste Hauler	Reclaimed or Reused	Other
					X		

E5. Description of Disposal Method:

a. On-Site - How is it disposed of (landfill, incineration, lagoon, landspreading, etc.)?

b. Hazardous Waste Hauler - Please give name and address Safety-Kleen Corp.
777 Big Timber Road, Elgin, Illinois 60123

c. Reclaimed or Reused - Please describe process, if on-site, or give name and address of reclaimer _____

d. Other - Please describe _____

E6. Do you store any hazardous wastes on-site? Yes X No

E7. Have you filed an EPA Form 8700-12 (Notification of Hazardous Waste Activity)? Yes X No
 If yes, please attach.

E8. What is your Hazardous Waste Number? NYD002111375

PART F - SCHEMATIC FLOW DIAGRAM

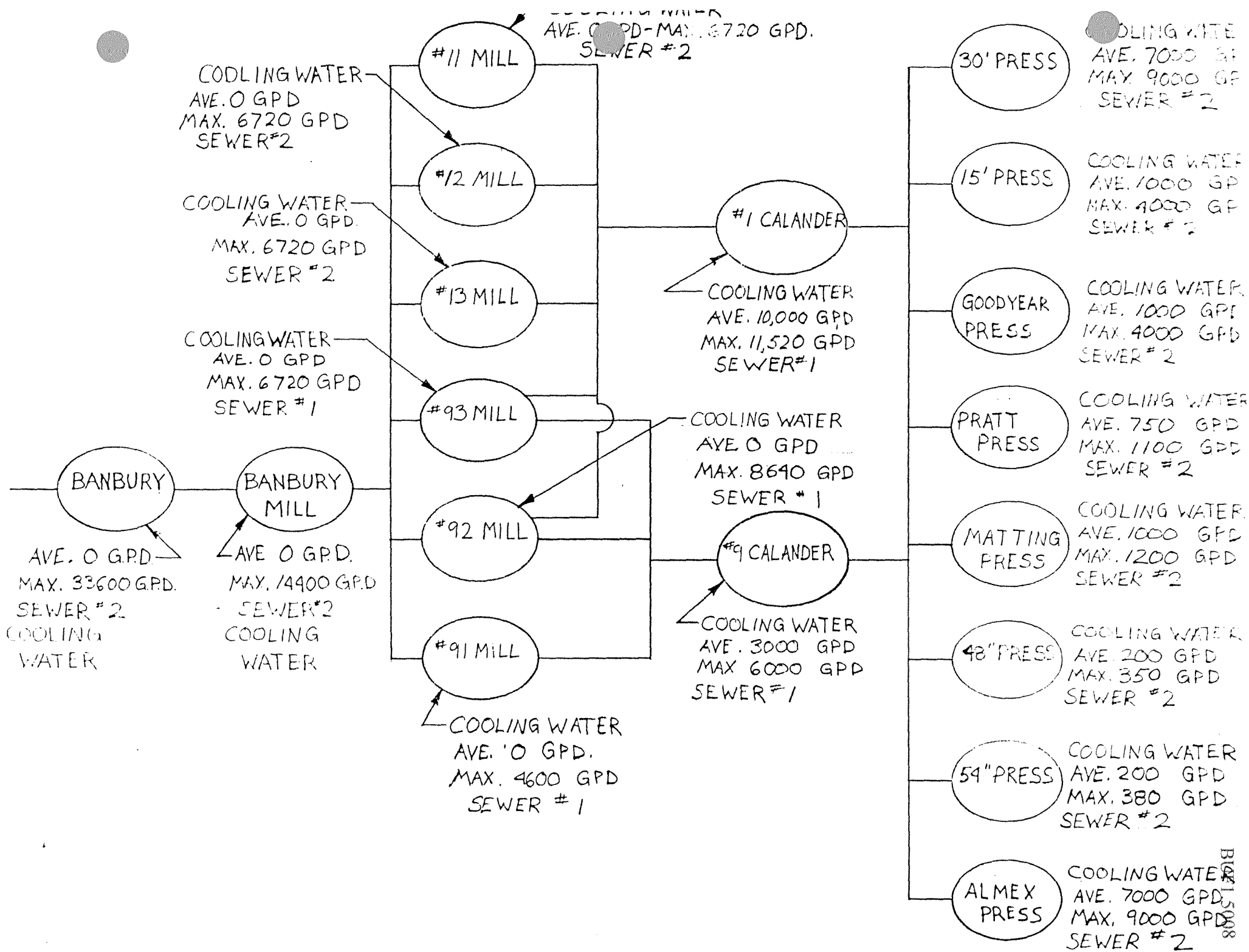
PURPOSE - The Schematic Flow Diagram shows the flow pattern of products through the facility and the various sources of wastewater.

F. Schematic Flow Diagram - For each major activity in which wastewater is generated, draw a diagram of the flow of materials and water from start to completed project, showing all unit processes generating wastewater. Number each unit process having wastewater discharges to the community sewer.

General Instructions - Type or print the information. A separate Part F should be completed for each major business activity described in Part B.

A line drawing (schematic flow diagram) of each major business activity described in Part B is to be drawn in on an attached sheet of paper (all sheets should be letter size). Number each process which generates wastewater using the same numbering as in the building layout or plant site plan shown in Part G. An example of drawing required is shown in Figure 1.

To determine your average daily volume and maximum daily volume of wastewater flow you may have to read water meters, sewer meters, or make estimates of volumes that are not directly measureable.

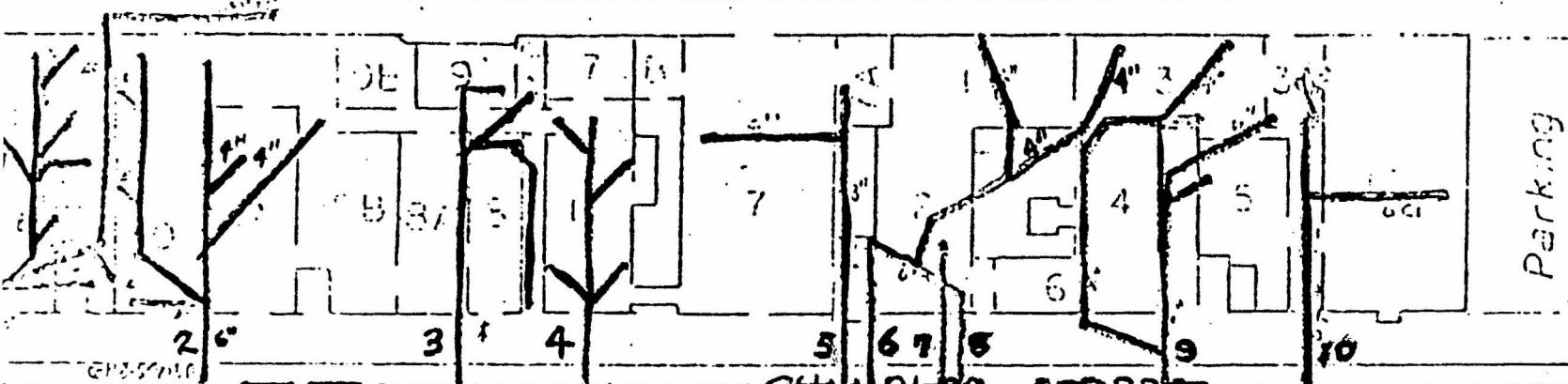


- #1 - 10" C.I.
- 2 - 6" ϕ
- 3 - UNKNOWN
- 4 - UNKNOWN
- 5 - 8" ϕ
- 6 - 6" ϕ

- #7 - 6" ϕ
- 8 - 6" ϕ
- 9 - 6" ϕ
- 10 - 6" ϕ T.
- 11 - UNKNOWN

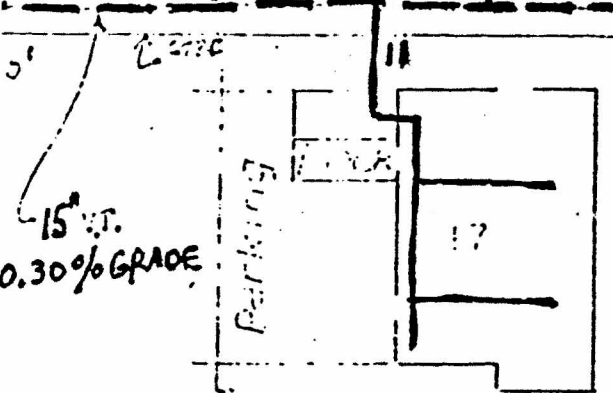


RR Siding



Parking

CHANDLER STREET



SEWER SYSTEM

PROPERTY OF
BUFFALO WEAVING &
BELTING CO.

10-1-75

**MALCOLM
PIRNIE****LETTER OF TRANSMITTAL**

To: Buffalo Economic Renaissance Corporation
617 Main Street
Buffalo, NY 14203

Attention: Peter Schiralli

Date: April 18, 2003
Re: Buffalo Weaving and Belting
Site Photographs

We are sending you ☒ Enclosed ☐ Under separate cover via ☐ Mail ☐ Messenger, the following items:

☐ shop drawings ☐ prints ☐ data sheets ☒ Photographs – March 28, 2003 _____

☐ specifications ☐ sketches ☐ brochures ☐ _____

Our action relative to items submitted for approval has been noted on the drawings.

COPIES	PREPARED BY	REFERENCE NO.	DESCRIPTION
1	MPI		Site Photographs Taken on March 28, 2003

THESE ARE TRANSMITTED AS CHECKED BELOW:

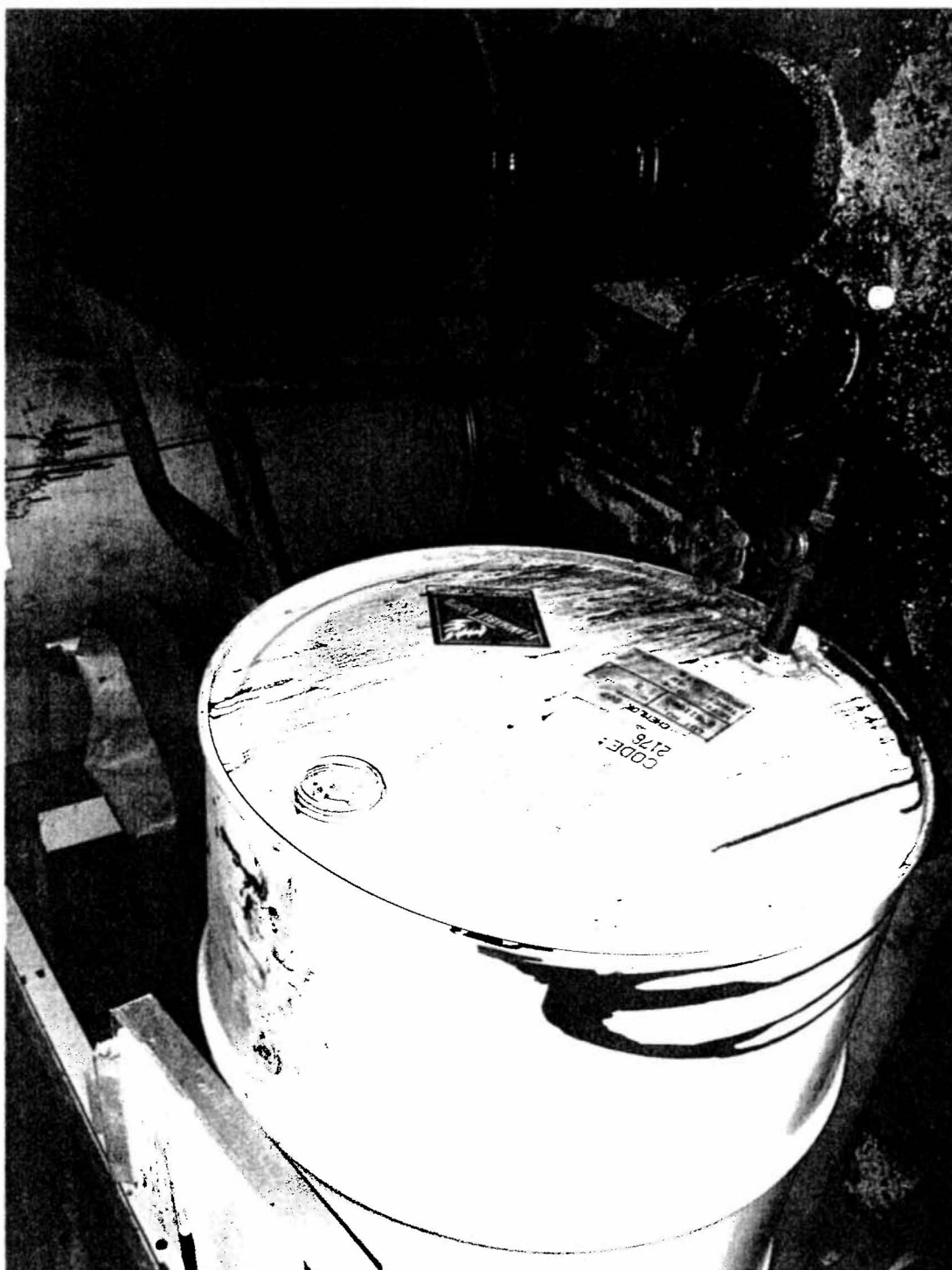
- | | | |
|--|--|---|
| <input checked="" type="checkbox"/> As requested | <input type="checkbox"/> Approved | <input type="checkbox"/> Resubmit _____ copies for approval |
| <input type="checkbox"/> For your use | <input type="checkbox"/> Approved as Corrected | <input type="checkbox"/> Submit _____ copies for distribution |
| <input type="checkbox"/> For review & comment | <input type="checkbox"/> Revise and Resubmit | <input type="checkbox"/> Return _____ corrected Prints |
| <input type="checkbox"/> For your information | <input type="checkbox"/> Not Approved | <input type="checkbox"/> _____ |

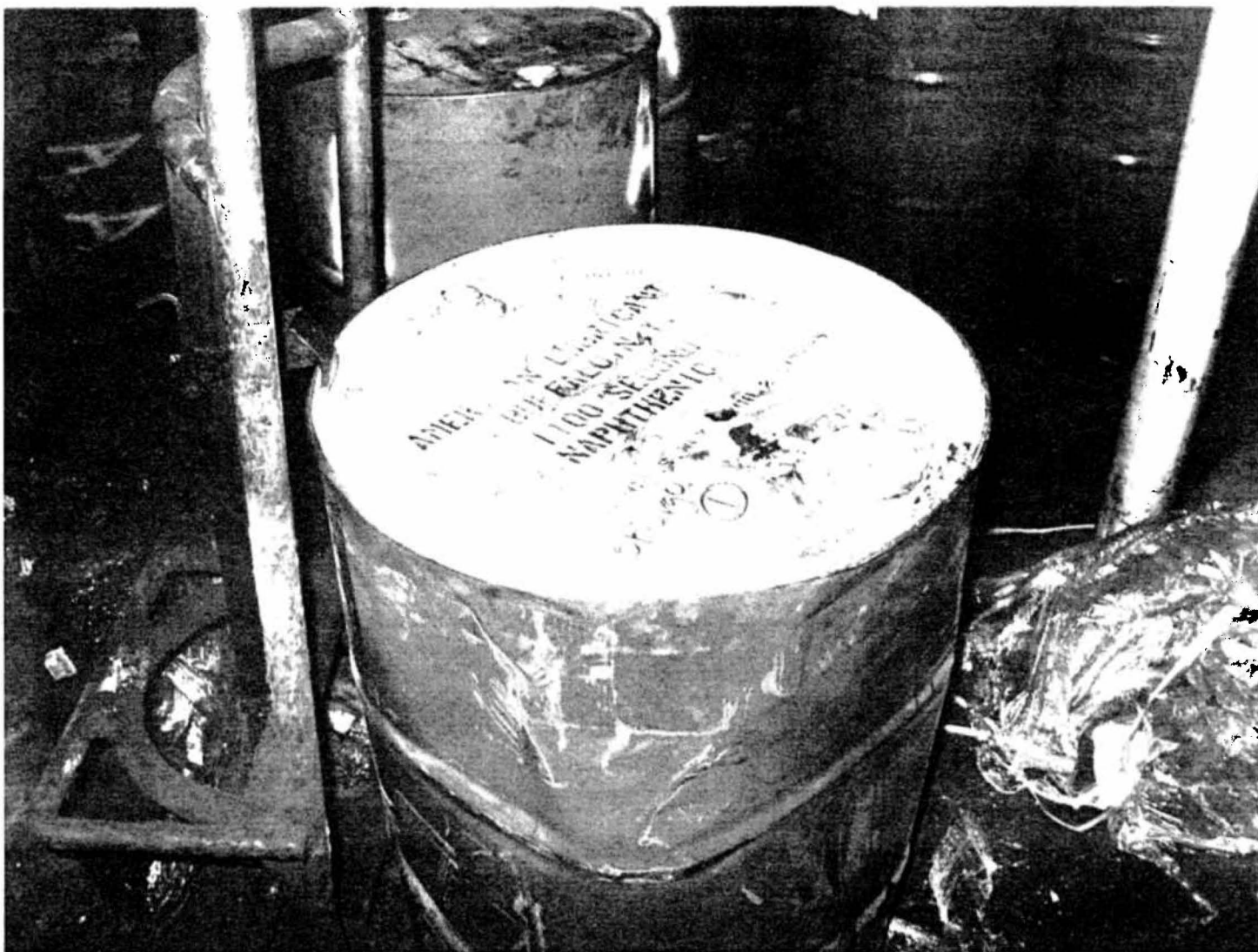
Remarks: Peter, The photographs are numbered and the sequence follows the path that we took through the building on March 28, 2003. Please let me know if there's anything else that I can help with on the project. _____

Very truly yours,

Copies:

Daniel E. Riker, P.G.
Project Hydrogeologist





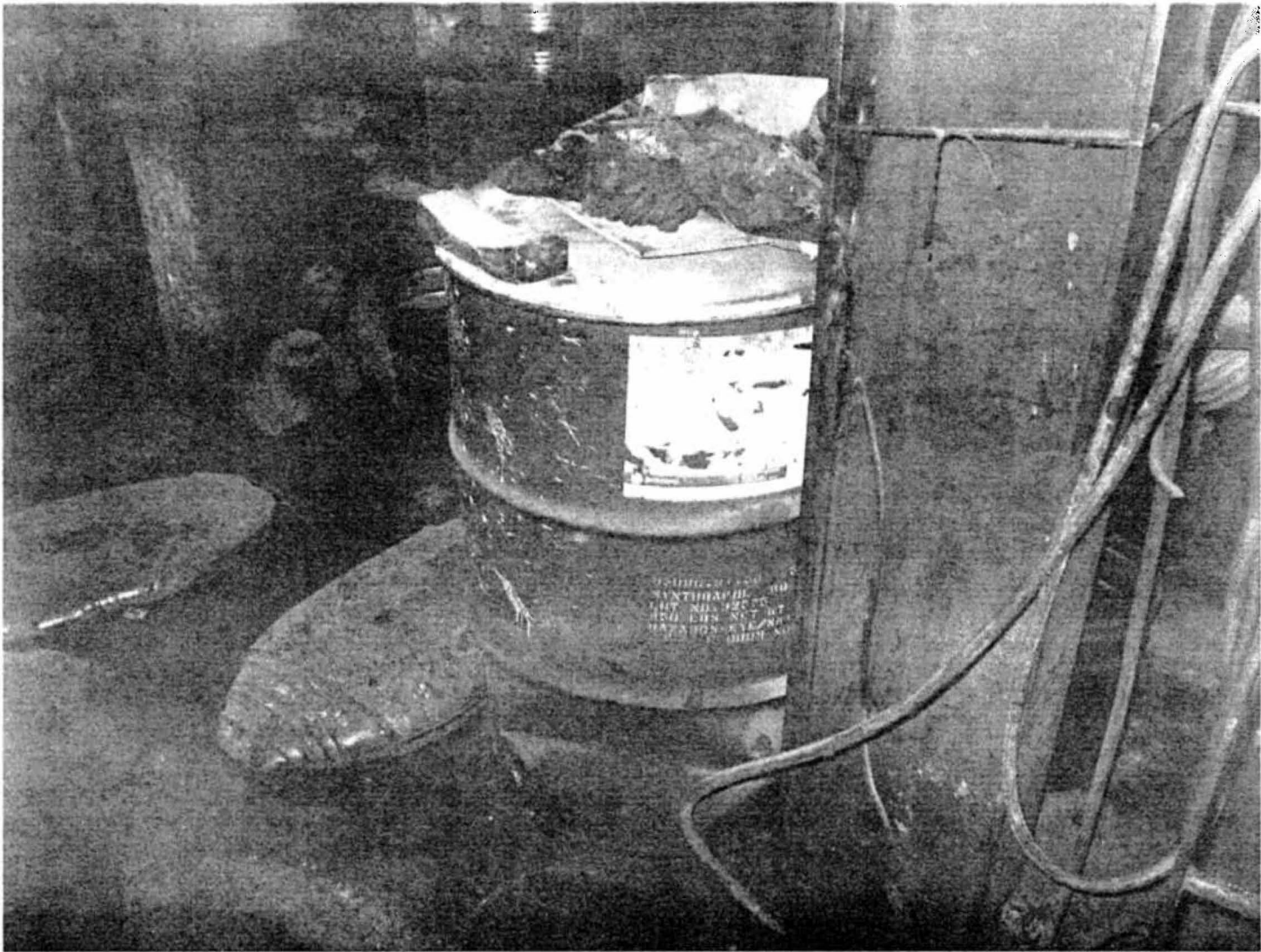
BUFI.6003
BwB 2



BUFI.6004

BvB 3





BUFI.6006
BwB5



BUFI.6007

Bu86



BWB7

BUFI.6008



Bw68

BUFI.6009



BWB9

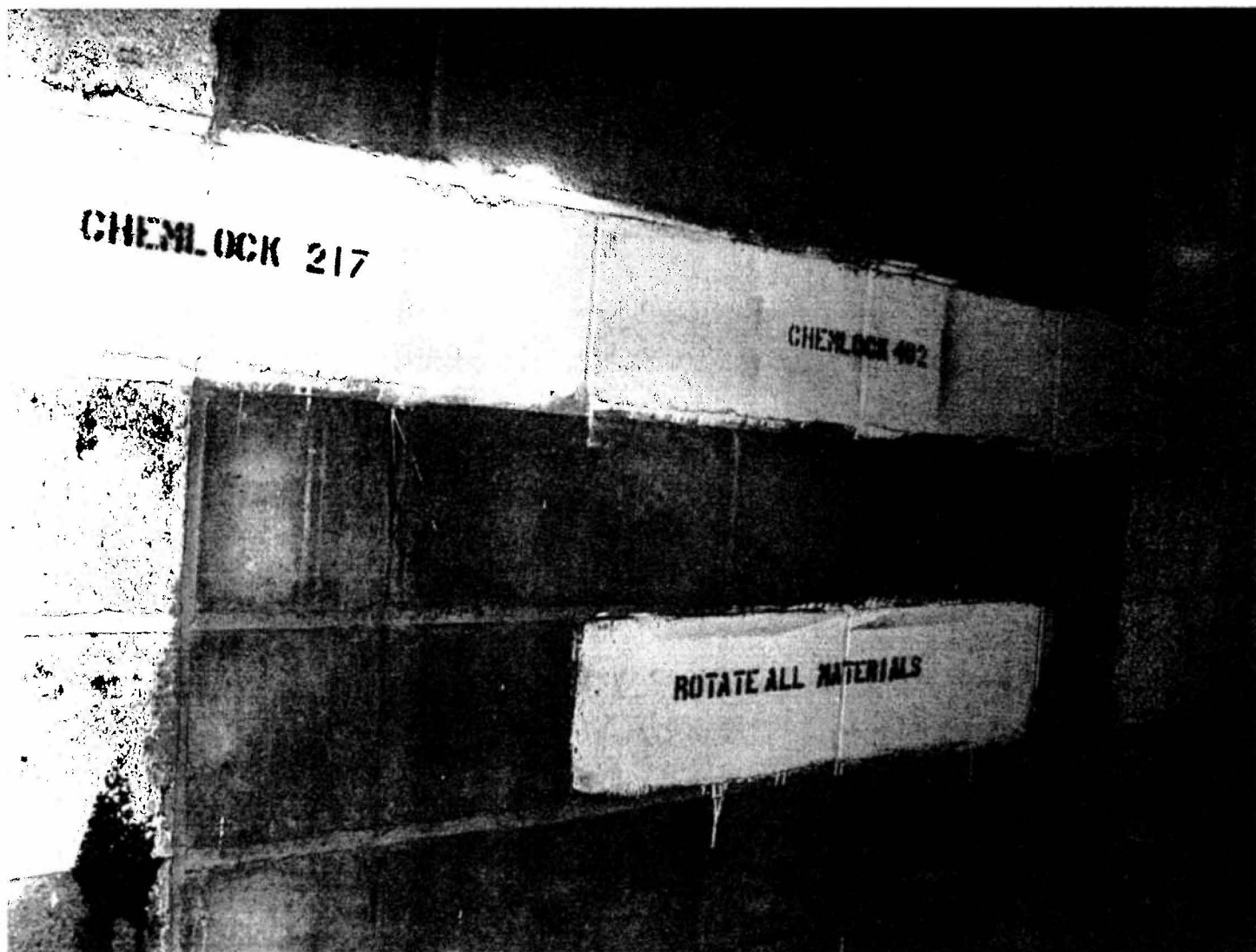
BUFI.6010



BWA 10

BUFI.6011





BWS 12

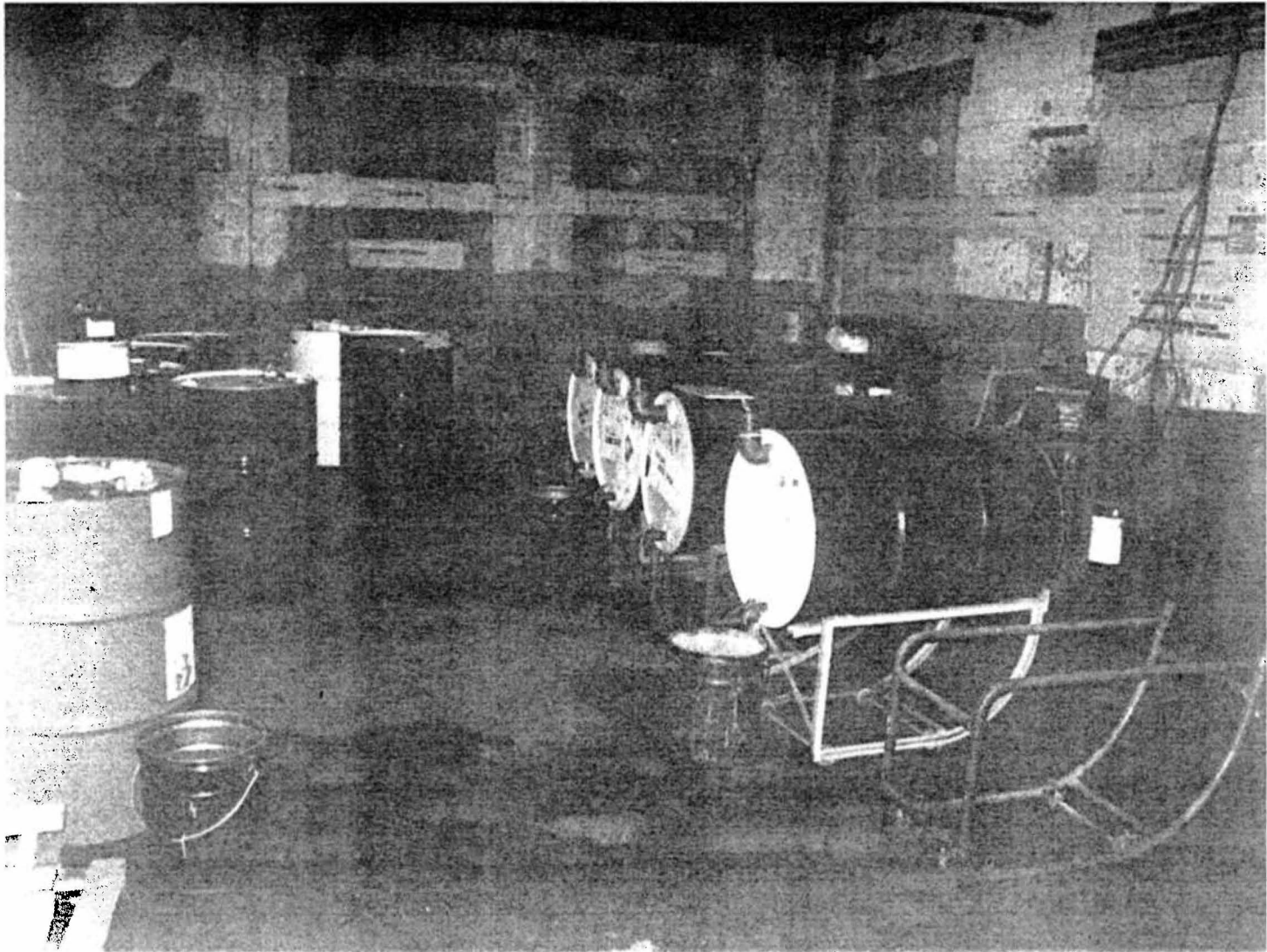






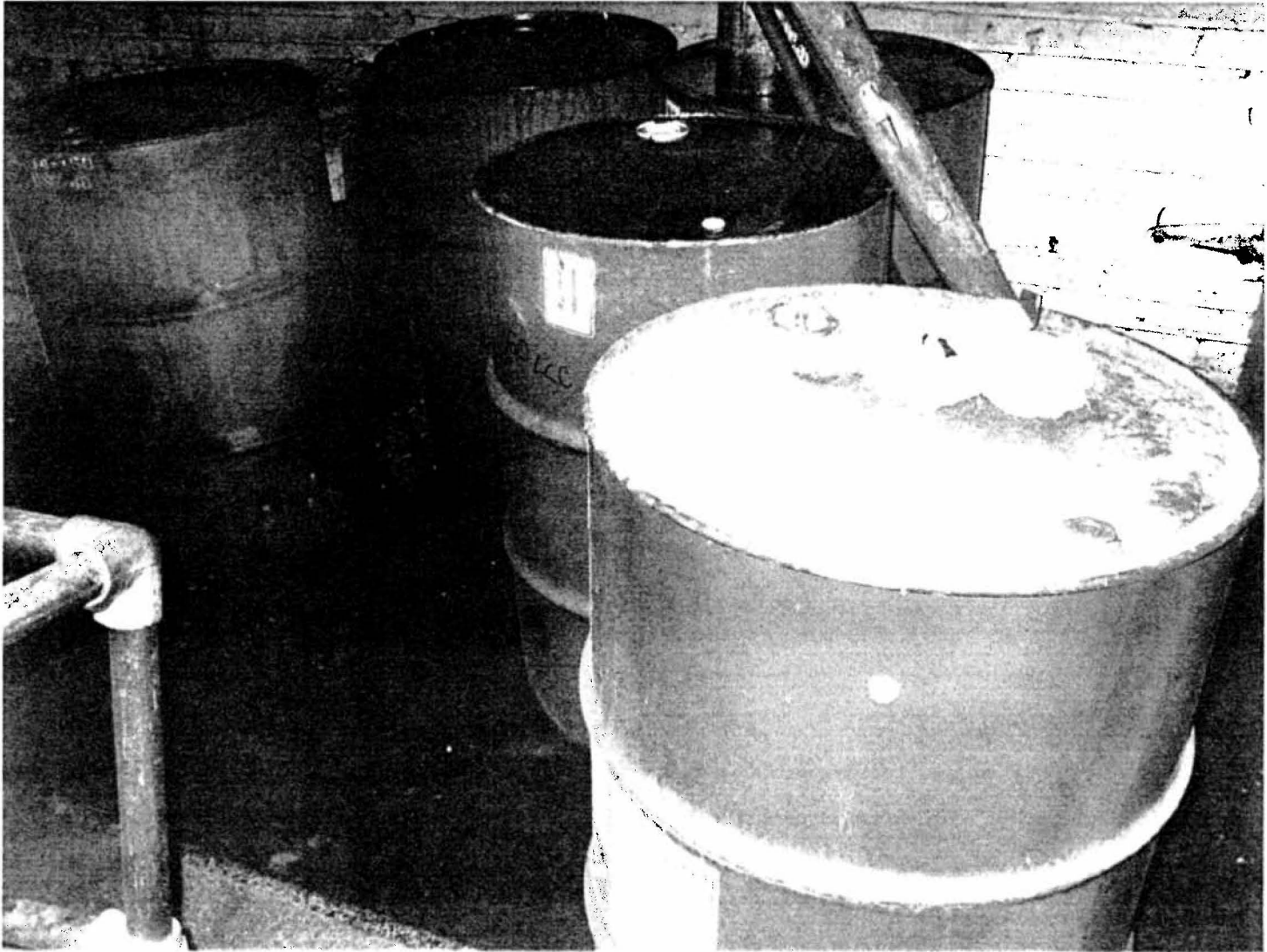
RWR/K

BUFI.6016



BUFI.6017

DIR/R/L



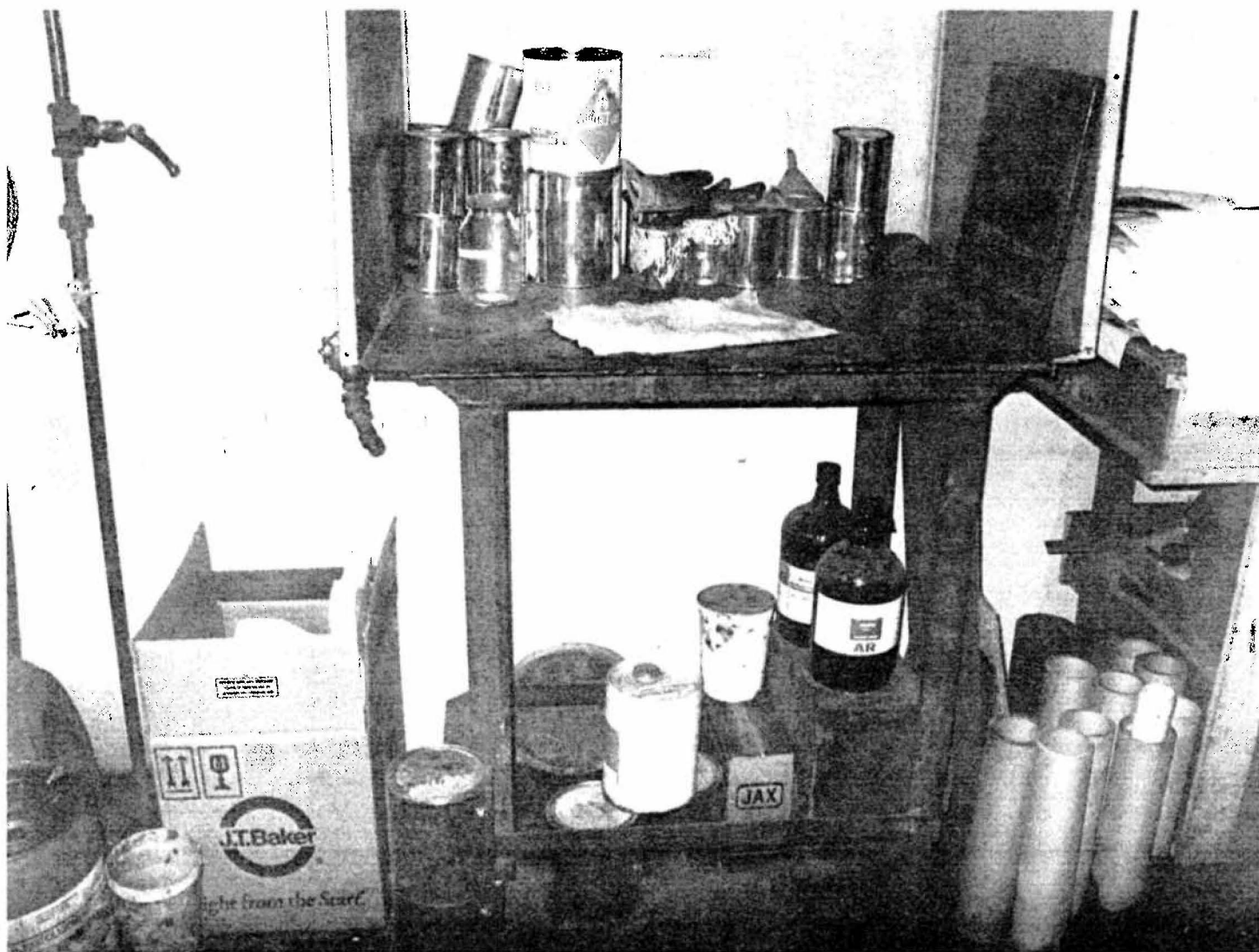
BUFI.6018

BWB17



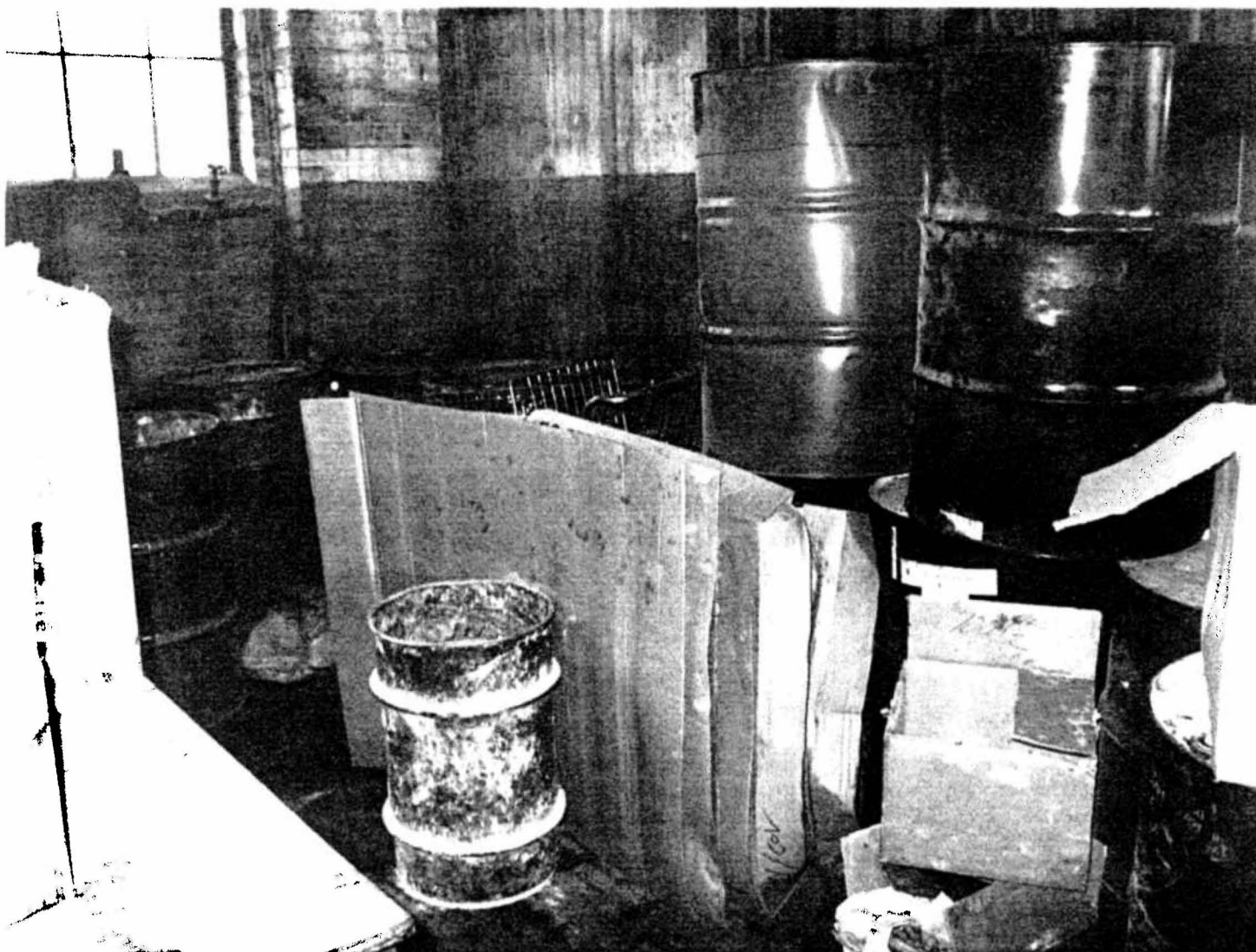
Bw318

BUFI.6019



BWB 27

BUFI.6020



BW3 28

BUFI.6021



BWB 29

BUFI.6022



BUFI.6023
BWB30



BWB 31

BUFI.6024



BUB 25

BUFI.6025



BWB2Y



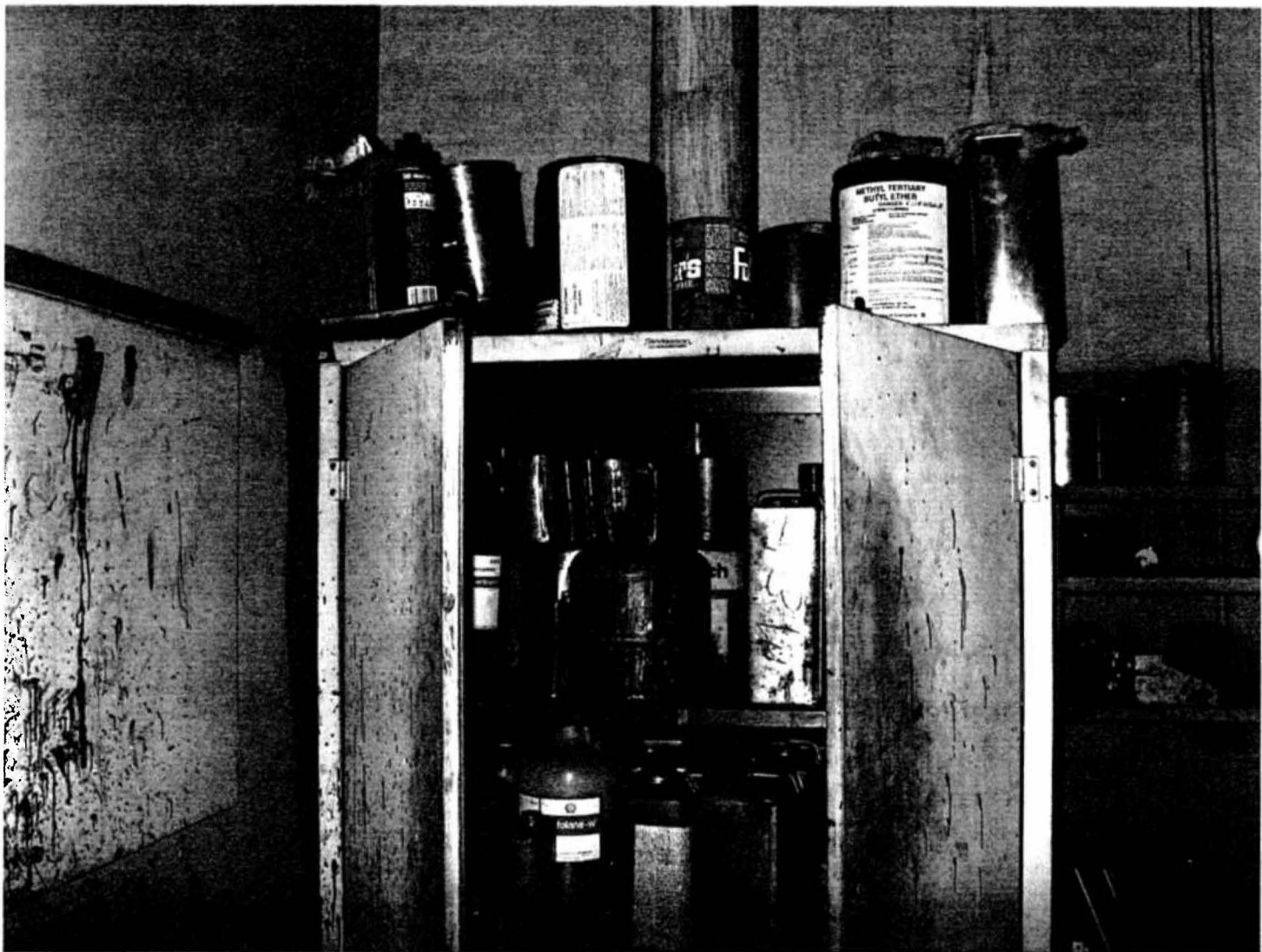
BUFI.6027

BWS 2



BUFI.6028

Beck



BWB 21

BUFI.6029



BUFI.6030
BWB20



BWB19

BUFI.6031



BUFI.6032

Box 9, 11



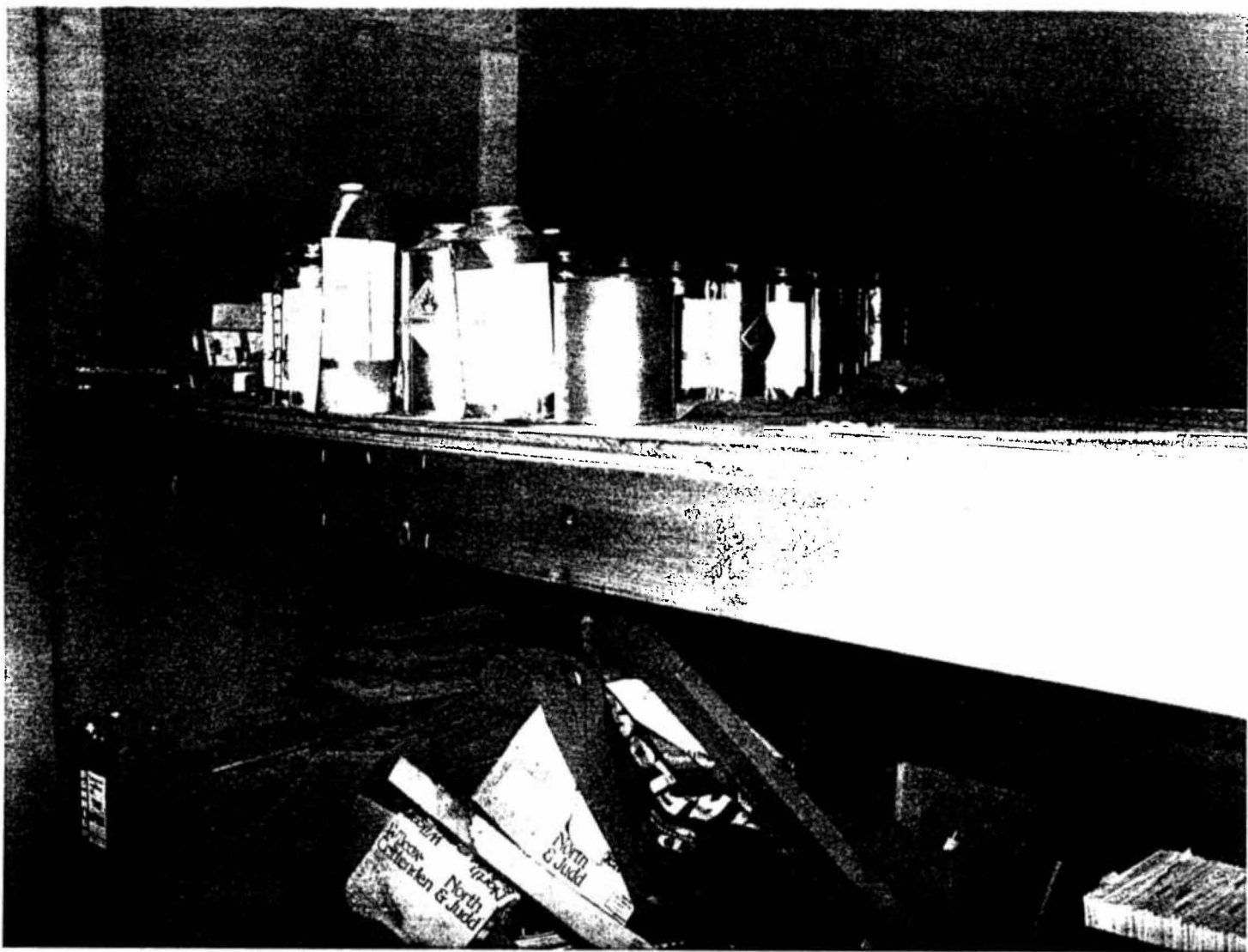
BWP 3.2

BUFI.6033





Aug 3 34



BWB 37



BWB 36



SWB 38

BUFI.6039



BUFI.6040
Bugs 38



Weston Solutions, Inc.
Federal Programs Division
Suite 201
1090 King Georges Post Road
Edison, New Jersey 08837-3703
732-225-6116 • Fax 732-225-7037
www.westonsolutions.com

REMOVAL SUPPORT TEAM
EPA CONTRACT 68-W-00-113

MEMORANDUM

TO: Kevin Matheis, USEPA

FR: Michael Mahnkopf, Weston Solutions, Inc. *M.M. 4/22/03*

DATE: April 22, 2003

RE: Buffalo Weaving & Belting Co., Buffalo, New York

On April 21, 2003, Weston's Removal Support Team (RST) performed radiation scans at the following locations of the Buffalo Weaving & Belting site. The scans were performed utilizing a Ludlum Model 19 Micro R radiation meter.

1. The rear exterior portion of the burnt building adjacent to the railroad tracks enclosed by the jersey barriers. All readings were 9-14 uR/hr (background).
2. The front exterior portion of the burnt building along Chandler Street enclosed by the jersey barriers. All readings were 9-13 uR/hr (background).

RST also performed air monitoring throughout the rear exterior portion of the burnt building adjacent to the railroad tracks enclosed by the jersey barriers. RST utilized a 5-gas Multi-Rae meter. Results were as follows: LEL = 0; CO = 0; H₂S = 0; VOC = 0; and O₂ = 20.9%.

Also attached are the results of the particulate monitoring performed utilizing data rams ID No. 2414 and ID No. 2636. Data ram ID No. 2414 was placed at the northeast corner doorway (No. 15) located at the rear portion of the burnt building enclosed by the jersey barriers. Data ram ID No. 2636 was placed at the northwest corner doorway located at the rear portion of the burnt building enclosed by the jersey barriers.



DataRAM ID# 2414

Tag Number 1

Number of logged points..... 369

Start time (hr:min:sec day/mon/yr)... 10:34:31 21-Apr-03

Elapsed time (hr:min:sec)..... 06:09:00

Averaging Time (sec)..... 10

Logging period (hr:min:sec)..... 00:01:00

CalFactor (%)..... 100

StelConc (ug/m3)..... 0.0

STEL occurrence after start (hr:min:sec)..... 00:00:00

Overall AvgConc (ug/m3)..... 1.1

Overall MaxConc (ug/m3)..... 3.3 at Point#...303

Overall MinConc (ug/m3)..... 0.1 at Point#...1
ug/m3

Point Label	"Min"	"Avg"	"Max"
4/21/2003 10:35	0.1	0.2	0.3
4/21/2003 10:36	0.7	0.8	1.5
4/21/2003 10:37	0.7	0.8	1.5
4/21/2003 10:38	0.6	0.7	1.3
4/21/2003 10:39	0.6	0.7	1.3
4/21/2003 10:40	0.6	0.7	1.3
4/21/2003 10:41	0.7	0.8	1.5
4/21/2003 10:42	0.6	0.7	1.3
4/21/2003 10:43	0.6	0.7	1.3
4/21/2003 10:44	0.6	0.7	1.3
4/21/2003 10:45	0.6	0.7	1.3
4/21/2003 10:46	0.6	0.7	1.3
4/21/2003 10:47	0.7	0.8	1.5
4/21/2003 10:48	0.6	0.7	1.3
4/21/2003 10:49	0.6	0.7	1.3
4/21/2003 10:50	0.8	0.9	1.7
4/21/2003 10:51	0.7	0.8	1.5
4/21/2003 10:52	0.8	0.9	1.7
4/21/2003 10:53	0.6	0.7	1.3
4/21/2003 10:54	0.7	0.8	1.5
4/21/2003 10:55	0.8	0.9	1.7
4/21/2003 10:56	0.7	0.8	1.5
4/21/2003 10:57	0.7	0.8	1.5
4/21/2003 10:58	0.7	0.8	1.5
4/21/2003 10:59	0.8	0.9	1.7
4/21/2003 11:00	0.7	0.8	1.5
4/21/2003 11:01	0.8	0.9	1.7
4/21/2003 11:02	0.7	0.8	1.5
4/21/2003 11:03	0.7	0.8	1.5
4/21/2003 11:04	0.8	0.9	1.7
4/21/2003 11:05	0.9	1	1.9
4/21/2003 11:06	0.8	0.9	1.7
4/21/2003 11:07	0.8	0.9	1.7
4/21/2003 11:08	0.8	0.9	1.7
4/21/2003 11:09	0.8	0.9	1.7
4/21/2003 11:10	0.9	1	1.9

4/21/2003 11:11	1.3	1.4	2.7
4/21/2003 11:12	0.8	0.9	1.7
4/21/2003 11:13	0.8	0.9	1.7
4/21/2003 11:14	0.9	1	1.9
4/21/2003 11:15	0.8	0.9	1.7
4/21/2003 11:16	0.9	1	1.9
4/21/2003 11:17	1	1.1	2.1
4/21/2003 11:18	0.8	0.9	1.7
4/21/2003 11:19	0.8	0.9	1.7
4/21/2003 11:20	1	1.1	2.1
4/21/2003 11:21	1	1.1	2.1
4/21/2003 11:22	1	1.1	2.1
4/21/2003 11:23	1.1	1.2	2.3
4/21/2003 11:24	1	1.1	2.1
4/21/2003 11:25	0.9	1	1.9
4/21/2003 11:26	1.1	1.2	2.3
4/21/2003 11:27	0.9	1	1.9
4/21/2003 11:28	0.9	1	1.9
4/21/2003 11:29	1.1	1.2	2.3
4/21/2003 11:30	1.1	1.2	2.3
4/21/2003 11:31	1.1	1.2	2.3
4/21/2003 11:32	1.1	1.2	2.3
4/21/2003 11:33	1	1.1	2.1
4/21/2003 11:34	1	1.1	2.1
4/21/2003 11:35	0.9	1	1.9
4/21/2003 11:36	1.1	1.2	2.3
4/21/2003 11:37	1	1.1	2.1
4/21/2003 11:38	0.9	1	1.9
4/21/2003 11:39	0.9	1	1.9
4/21/2003 11:40	0.9	1	1.9
4/21/2003 11:41	1.1	1.2	2.3
4/21/2003 11:42	1.1	1.2	2.3
4/21/2003 11:43	1.1	1.2	2.3
4/21/2003 11:44	1.1	1.2	2.3
4/21/2003 11:45	1.1	1.2	2.3
4/21/2003 11:46	1.2	1.3	2.5
4/21/2003 11:47	1	1.1	2.1
4/21/2003 11:48	1	1.1	2.1
4/21/2003 11:49	1	1.1	2.1
4/21/2003 11:50	1	1.1	2.1
4/21/2003 11:51	0.9	1	1.9
4/21/2003 11:52	1.1	1.2	2.3
4/21/2003 11:53	1.1	1.2	2.3
4/21/2003 11:54	1	1.1	2.1
4/21/2003 11:55	1.1	1.2	2.3
4/21/2003 11:56	1.2	1.3	2.5
4/21/2003 11:57	1.1	1.2	2.3
4/21/2003 11:58	1.1	1.2	2.3
4/21/2003 11:59	1.2	1.3	2.5
4/21/2003 12:00	1.2	1.3	2.5
4/21/2003 12:01	1.1	1.2	2.3
4/21/2003 12:02	1.2	1.3	2.5

4/21/2003 12:03	1.5	1.6	3.1
4/21/2003 12:04	1.2	1.3	2.5
4/21/2003 12:05	1.3	1.4	2.7
4/21/2003 12:06	1.2	1.3	2.5
4/21/2003 12:07	1.2	1.3	2.5
4/21/2003 12:08	1.1	1.2	2.3
4/21/2003 12:09	1.1	1.2	2.3
4/21/2003 12:10	1.1	1.2	2.3
4/21/2003 12:11	0.9	1	1.9
4/21/2003 12:12	1.1	1.2	2.3
4/21/2003 12:13	1	1.1	2.1
4/21/2003 12:14	1.1	1.2	2.3
4/21/2003 12:15	1.1	1.2	2.3
4/21/2003 12:16	1.1	1.2	2.3
4/21/2003 12:17	1.2	1.3	2.5
4/21/2003 12:18	1.1	1.2	2.3
4/21/2003 12:19	1.1	1.2	2.3
4/21/2003 12:20	1.2	1.3	2.5
4/21/2003 12:21	1.1	1.2	2.3
4/21/2003 12:22	1.1	1.2	2.3
4/21/2003 12:23	1.3	1.4	2.7
4/21/2003 12:24	1.1	1.2	2.3
4/21/2003 12:25	1.4	1.5	2.9
4/21/2003 12:26	1.4	1.5	2.9
4/21/2003 12:27	1.1	1.2	2.3
4/21/2003 12:28	1.3	1.4	2.7
4/21/2003 12:29	1.1	1.2	2.3
4/21/2003 12:30	1.3	1.4	2.7
4/21/2003 12:31	1.4	1.5	2.9
4/21/2003 12:32	1	1.1	2.1
4/21/2003 12:33	1.1	1.2	2.3
4/21/2003 12:34	1	1.1	2.1
4/21/2003 12:35	0.9	1	1.9
4/21/2003 12:36	0.8	0.9	1.7
4/21/2003 12:37	0.9	1	1.9
4/21/2003 12:38	0.9	1	1.9
4/21/2003 12:39	0.9	1	1.9
4/21/2003 12:40	0.9	1	1.9
4/21/2003 12:41	0.8	0.9	1.7
4/21/2003 12:42	0.9	1	1.9
4/21/2003 12:43	1	1.1	2.1
4/21/2003 12:44	1	1.1	2.1
4/21/2003 12:45	1	1.1	2.1
4/21/2003 12:46	1.1	1.2	2.3
4/21/2003 12:47	1	1.1	2.1
4/21/2003 12:48	1	1.1	2.1
4/21/2003 12:49	1.1	1.2	2.3
4/21/2003 12:50	1	1.1	2.1
4/21/2003 12:51	1	1.1	2.1
4/21/2003 12:52	1.1	1.2	2.3
4/21/2003 12:53	1.2	1.3	2.5
4/21/2003 12:54	1	1.1	2.1

4/21/2003 12:55	1	1.1	2.1
4/21/2003 12:56	1.1	1.2	2.3
4/21/2003 12:57	1	1.1	2.1
4/21/2003 12:58	1.1	1.2	2.3
4/21/2003 12:59	0.9	1	1.9
4/21/2003 13:00	1.1	1.2	2.3
4/21/2003 13:01	1.1	1.2	2.3
4/21/2003 13:02	0.8	0.9	1.7
4/21/2003 13:03	0.9	1	1.9
4/21/2003 13:04	0.9	1	1.9
4/21/2003 13:05	0.9	1	1.9
4/21/2003 13:06	1	1.1	2.1
4/21/2003 13:07	0.7	0.8	1.5
4/21/2003 13:08	0.8	0.9	1.7
4/21/2003 13:09	0.8	0.9	1.7
4/21/2003 13:10	0.6	0.7	1.3
4/21/2003 13:11	0.8	0.9	1.7
4/21/2003 13:12	0.7	0.8	1.5
4/21/2003 13:13	0.7	0.8	1.5
4/21/2003 13:14	0.7	0.8	1.5
4/21/2003 13:15	0.7	0.8	1.5
4/21/2003 13:16	0.6	0.7	1.3
4/21/2003 13:17	0.6	0.7	1.3
4/21/2003 13:18	0.7	0.8	1.5
4/21/2003 13:19	0.7	0.8	1.5
4/21/2003 13:20	0.7	0.8	1.5
4/21/2003 13:21	0.8	0.9	1.7
4/21/2003 13:22	0.8	0.9	1.7
4/21/2003 13:23	0.8	0.9	1.7
4/21/2003 13:24	0.7	0.8	1.5
4/21/2003 13:25	0.8	0.9	1.7
4/21/2003 13:26	0.7	0.8	1.5
4/21/2003 13:27	0.7	0.8	1.5
4/21/2003 13:28	0.7	0.8	1.5
4/21/2003 13:29	0.7	0.8	1.5
4/21/2003 13:30	0.7	0.8	1.5
4/21/2003 13:31	0.8	0.9	1.7
4/21/2003 13:32	0.7	0.8	1.5
4/21/2003 13:33	0.7	0.8	1.5
4/21/2003 13:34	0.8	0.9	1.7
4/21/2003 13:35	0.8	0.9	1.7
4/21/2003 13:36	0.8	0.9	1.7
4/21/2003 13:37	0.8	0.9	1.7
4/21/2003 13:38	0.8	0.9	1.7
4/21/2003 13:39	0.9	1	1.9
4/21/2003 13:40	0.8	0.9	1.7
4/21/2003 13:41	0.9	1	1.9
4/21/2003 13:42	0.9	1	1.9
4/21/2003 13:43	0.9	1	1.9
4/21/2003 13:44	0.8	0.9	1.7
4/21/2003 13:45	0.9	1	1.9
4/21/2003 13:46	0.8	0.9	1.7

4/21/2003 13:47	0.9	1	1.9
4/21/2003 13:48	0.8	0.9	1.7
4/21/2003 13:49	0.8	0.9	1.7
4/21/2003 13:50	0.8	0.9	1.7
4/21/2003 13:51	0.8	0.9	1.7
4/21/2003 13:52	0.8	0.9	1.7
4/21/2003 13:53	0.9	1	1.9
4/21/2003 13:54	0.9	1	1.9
4/21/2003 13:55	0.8	0.9	1.7
4/21/2003 13:56	0.9	1	1.9
4/21/2003 13:57	0.8	0.9	1.7
4/21/2003 13:58	0.8	0.9	1.7
4/21/2003 13:59	0.9	1	1.9
4/21/2003 14:00	0.8	0.9	1.7
4/21/2003 14:01	0.8	0.9	1.7
4/21/2003 14:02	0.8	0.9	1.7
4/21/2003 14:03	0.9	1	1.9
4/21/2003 14:04	0.9	1	1.9
4/21/2003 14:05	0.9	1	1.9
4/21/2003 14:06	0.8	0.9	1.7
4/21/2003 14:07	1	1.1	2.1
4/21/2003 14:08	0.8	0.9	1.7
4/21/2003 14:09	1	1.1	2.1
4/21/2003 14:10	0.9	1	1.9
4/21/2003 14:11	1	1.1	2.1
4/21/2003 14:12	1.1	1.2	2.3
4/21/2003 14:13	1	1.1	2.1
4/21/2003 14:14	1	1.1	2.1
4/21/2003 14:15	1.1	1.2	2.3
4/21/2003 14:16	1	1.1	2.1
4/21/2003 14:17	1.1	1.2	2.3
4/21/2003 14:18	1	1.1	2.1
4/21/2003 14:19	0.9	1	1.9
4/21/2003 14:20	1.2	1.3	2.5
4/21/2003 14:21	0.9	1	1.9
4/21/2003 14:22	1.1	1.2	2.3
4/21/2003 14:23	1.2	1.3	2.5
4/21/2003 14:24	1	1.1	2.1
4/21/2003 14:25	1.1	1.2	2.3
4/21/2003 14:26	1.2	1.3	2.5
4/21/2003 14:27	1.1	1.2	2.3
4/21/2003 14:28	1.1	1.2	2.3
4/21/2003 14:29	1.1	1.2	2.3
4/21/2003 14:30	1.2	1.3	2.5
4/21/2003 14:31	1.2	1.3	2.5
4/21/2003 14:32	1.1	1.2	2.3
4/21/2003 14:33	1.1	1.2	2.3
4/21/2003 14:34	1.2	1.3	2.5
4/21/2003 14:35	1.1	1.2	2.3
4/21/2003 14:36	1.3	1.4	2.7
4/21/2003 14:37	1.1	1.2	2.3
4/21/2003 14:38	1.2	1.3	2.5

4/21/2003 14:39	1.2	1.3	2.5
4/21/2003 14:40	1.3	1.4	2.7
4/21/2003 14:41	1.2	1.3	2.5
4/21/2003 14:42	1.1	1.2	2.3
4/21/2003 14:43	1.3	1.4	2.7
4/21/2003 14:44	1.2	1.3	2.5
4/21/2003 14:45	1.1	1.2	2.3
4/21/2003 14:46	1.3	1.4	2.7
4/21/2003 14:47	1.3	1.4	2.7
4/21/2003 14:48	1.4	1.5	2.9
4/21/2003 14:49	1.5	1.6	3.1
4/21/2003 14:50	1.3	1.4	2.7
4/21/2003 14:51	1.3	1.4	2.7
4/21/2003 14:52	1.3	1.4	2.7
4/21/2003 14:53	1.2	1.3	2.5
4/21/2003 14:54	1.3	1.4	2.7
4/21/2003 14:55	1.4	1.5	2.9
4/21/2003 14:56	1.3	1.4	2.7
4/21/2003 14:57	1.4	1.5	2.9
4/21/2003 14:58	1.3	1.4	2.7
4/21/2003 14:59	1.4	1.5	2.9
4/21/2003 15:00	1.3	1.4	2.7
4/21/2003 15:01	1.3	1.4	2.7
4/21/2003 15:02	1.3	1.4	2.7
4/21/2003 15:03	1.4	1.5	2.9
4/21/2003 15:04	1.3	1.4	2.7
4/21/2003 15:05	1.3	1.4	2.7
4/21/2003 15:06	1.4	1.5	2.9
4/21/2003 15:07	1.4	1.5	2.9
4/21/2003 15:08	1.3	1.4	2.7
4/21/2003 15:09	1.4	1.5	2.9
4/21/2003 15:10	1.3	1.4	2.7
4/21/2003 15:11	1.5	1.6	3.1
4/21/2003 15:12	1.4	1.5	2.9
4/21/2003 15:13	1.3	1.4	2.7
4/21/2003 15:14	1.4	1.5	2.9
4/21/2003 15:15	1.4	1.5	2.9
4/21/2003 15:16	1.4	1.5	2.9
4/21/2003 15:17	1.4	1.5	2.9
4/21/2003 15:18	1.4	1.5	2.9
4/21/2003 15:19	1.4	1.5	2.9
4/21/2003 15:20	1.4	1.5	2.9
4/21/2003 15:21	1.4	1.5	2.9
4/21/2003 15:22	1.4	1.5	2.9
4/21/2003 15:23	1.3	1.4	2.7
4/21/2003 15:24	1.4	1.5	2.9
4/21/2003 15:25	1.5	1.6	3.1
4/21/2003 15:26	1.3	1.4	2.7
4/21/2003 15:27	1.5	1.6	3.1
4/21/2003 15:28	1.4	1.5	2.9
4/21/2003 15:29	1.4	1.5	2.9
4/21/2003 15:30	1.4	1.5	2.9

4/21/2003 15:31	1.3	1.4	2.7
4/21/2003 15:32	1.5	1.6	3.1
4/21/2003 15:33	1.3	1.4	2.7
4/21/2003 15:34	1.4	1.5	2.9
4/21/2003 15:35	1.4	1.5	2.9
4/21/2003 15:36	1.3	1.4	2.7
4/21/2003 15:37	1.6	1.7	3.3
4/21/2003 15:38	1.3	1.4	2.7
4/21/2003 15:39	1.5	1.6	3.1
4/21/2003 15:40	1.4	1.5	2.9
4/21/2003 15:41	1.3	1.4	2.7
4/21/2003 15:42	1.3	1.4	2.7
4/21/2003 15:43	1.3	1.4	2.7
4/21/2003 15:44	1.3	1.4	2.7
4/21/2003 15:45	1.4	1.5	2.9
4/21/2003 15:46	1.2	1.3	2.5
4/21/2003 15:47	1.3	1.4	2.7
4/21/2003 15:48	1.4	1.5	2.9
4/21/2003 15:49	1.3	1.4	2.7
4/21/2003 15:50	1.3	1.4	2.7
4/21/2003 15:51	1.4	1.5	2.9
4/21/2003 15:52	1.4	1.5	2.9
4/21/2003 15:53	1.3	1.4	2.7
4/21/2003 15:54	1.3	1.4	2.7
4/21/2003 15:55	1.3	1.4	2.7
4/21/2003 15:56	1.3	1.4	2.7
4/21/2003 15:57	1.3	1.4	2.7
4/21/2003 15:58	1.2	1.3	2.5
4/21/2003 15:59	1.3	1.4	2.7
4/21/2003 16:00	1.3	1.4	2.7
4/21/2003 16:01	1.2	1.3	2.5
4/21/2003 16:02	1.3	1.4	2.7
4/21/2003 16:03	1.3	1.4	2.7
4/21/2003 16:04	1.2	1.3	2.5
4/21/2003 16:05	1.3	1.4	2.7
4/21/2003 16:06	1.3	1.4	2.7
4/21/2003 16:07	1.3	1.4	2.7
4/21/2003 16:08	1.3	1.4	2.7
4/21/2003 16:09	1.2	1.3	2.5
4/21/2003 16:10	1.2	1.3	2.5
4/21/2003 16:11	1.3	1.4	2.7
4/21/2003 16:12	1.2	1.3	2.5
4/21/2003 16:13	1.3	1.4	2.7
4/21/2003 16:14	1.1	1.2	2.3
4/21/2003 16:15	1.3	1.4	2.7
4/21/2003 16:16	1.2	1.3	2.5
4/21/2003 16:17	1.2	1.3	2.5
4/21/2003 16:18	1.2	1.3	2.5
4/21/2003 16:19	1.2	1.3	2.5
4/21/2003 16:20	1.3	1.4	2.7
4/21/2003 16:21	1.2	1.3	2.5
4/21/2003 16:22	1.2	1.3	2.5

4/21/2003 16:23	1.2	1.3	2.5
4/21/2003 16:24	1.3	1.4	2.7
4/21/2003 16:25	1.1	1.2	2.3
4/21/2003 16:26	1.2	1.3	2.5
4/21/2003 16:27	1.1	1.2	2.3
4/21/2003 16:28	1.1	1.2	2.3
4/21/2003 16:29	1.3	1.4	2.7
4/21/2003 16:30	1.1	1.2	2.3
4/21/2003 16:31	1.2	1.3	2.5
4/21/2003 16:32	1.1	1.2	2.3
4/21/2003 16:33	1.2	1.3	2.5
4/21/2003 16:34	1.1	1.2	2.3
4/21/2003 16:35	1.1	1.2	2.3
4/21/2003 16:36	1.1	1.2	2.3
4/21/2003 16:37	1.1	1.2	2.3
4/21/2003 16:38	1.1	1.2	2.3
4/21/2003 16:39	1.1	1.2	2.3
4/21/2003 16:40	1	1.1	2.1
4/21/2003 16:41	1	1.1	2.1
4/21/2003 16:42	1	1.1	2.1
4/21/2003 16:43	1.1	1.2	2.3

DataRAM ID# 2636

Tag Number 1

Number of logged points..... 362

Start time (hr:min:sec day/mon/yr)... 10:51:21 21-Apr-03

Elapsed time (hr:min:sec)..... 06:02:00

Averaging Time (sec)..... 1

Logging period (hr:min:sec)..... 00:01:00

CalFactor (%)..... 100

StelConc (ug/m3)..... 0.0

STEL occurrence after start (hr:min:sec)..... 00:00:00

Overall AvgConc (ug/m3)..... 0.0

Overall MaxConc (ug/m3)..... 0.0 at Point#...0

Overall MinConc (ug/m3)..... 0.0 at Point#...1

ug/m3

Point Label	"Min"	"Avg"	"Max"
4/21/2003 10:52	0	0	0
4/21/2003 10:53	0	0	0
4/21/2003 10:54	0	0	0
4/21/2003 10:55	0	0	0
4/21/2003 10:56	0	0	0
4/21/2003 10:57	0	0	0
4/21/2003 10:58	0	0	0
4/21/2003 10:59	0	0	0
4/21/2003 11:00	0	0	0
4/21/2003 11:01	0	0	0
4/21/2003 11:02	0	0	0
4/21/2003 11:03	0	0	0
4/21/2003 11:04	0	0	0
4/21/2003 11:05	0	0	0
4/21/2003 11:06	0	0	0
4/21/2003 11:07	0	0	0
4/21/2003 11:08	0	0	0
4/21/2003 11:09	0	0	0
4/21/2003 11:10	0	0	0
4/21/2003 11:11	0	0	0
4/21/2003 11:12	0	0	0
4/21/2003 11:13	0	0	0
4/21/2003 11:14	0	0	0
4/21/2003 11:15	0	0	0
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY


REGION 2

290 BROADWAY


NEW YORK, NY 10007-1866

DATE: MAY - 1 2003

SUBJECT: Documentation of Verbal Authorization and Request for a Ceiling Increase for a Removal Action at the Buffalo Weaving and Belting Company Site, Buffalo, Erie County, New York

FROM: 
Kevin M. Matheis, On-Scene Coordinator
Removal Action Branch

TO: George Pavlou, Director,
Emergency and Remedial Response Division

THRU: 
Richard C. Salkie, Chief
Removal Action Branch

Site ID #: TU

I. PURPOSE

The purpose of this Action Memorandum is to document the verbal authorization received to initiate a removal action and to request a ceiling increase to conduct the proposed removal activities described herein at the Buffalo Weaving and Belting Company Site (Site) in Buffalo, Erie County, New York. On April 18, 2003, the Director of the Emergency and Remedial Response Division provided verbal authorization of \$50,000 to provide security, fencing and lighting and to begin assessing the fire damaged buildings at the Site. The project ceiling was \$70,000, of which \$50,000 was for mitigation contracting.

The response actions necessary to mitigate the threats are expected to cost an additional \$971,000 (\$713,000 in contract mitigation costs) which will bring the total estimated project ceiling to \$1,041,000 (\$763,000 in contract mitigation costs).

Conditions at the Site continue to meet the criteria for a removal action under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. § 9601 et seq., as documented in Section 300.415(b)(2) of the National Contingency Plan (NCP).

There are no nationally significant or precedent-setting issues associated with this removal action.

II. SITE CONDITIONS AND BACKGROUND

This Action Memorandum documents the proposed time-critical action for the Site. The Comprehensive Environmental Response, Compensation and Liability Information System ID number for the Site is NYD002111375.

A. Site Description

1. Removal Site evaluation (RSE)

The Site is the location of a former sheet rubber and textile/rubber belt manufacturing facility. Manufacturing was conducted from 1892 until January 2003. On April 15 and 16, 2003, a three-alarm fire destroyed the central portions of five of the Site buildings where rubber products were produced. Arson was the suspected cause of the fire and suspects have been arrested. As a result of the damage caused by the fire, on April 18, 2003 the Site was verbally referred to the U.S. Environmental Protection Agency (EPA) by the New York State Department of Environmental Conservation (NYSDEC) for a CERCLA removal action. Written confirmation of this verbal referral was provided by NYSDEC in correspondence dated April 23, 2003 and is included as Attachment 1. The referral requested that EPA perform an appropriate CERCLA response action based upon Site conditions after the fire.

Following the verbal request for assistance by NYSDEC, EPA performed a Site visit on April 18, 2003. During the Site visit, the EPA On-Scene Coordinator performed an expedited removal assessment (ERA). The major observations noted during the ERA include the following:

- Approximately five of nine Site buildings were damaged or destroyed by the fire and contain intact and fire-damaged drums;
- Suspected asbestos-coated piping exists throughout the five fire-damaged buildings, including areas where the roof had collapsed onto piping and fire-fighting water had damaged the asbestos pipe wrapping; and
- No Site security or fencing exists in the front or rear of the Site.

In addition to the observations in the field, the City of Buffalo provided EPA with a drum and laboratory inventory conducted in March 2003. This inventory revealed the presence of approximately 100 55-gallon drums and approximately 500 containers of chemicals in containers sized five gallons or less. The inventory revealed the presence of methyl ethyl ketone, toluene, ammonia, trichloroethene and various containers of unknowns. This inventory was completed for all of the buildings at the Site and at this time, it is uncertain which containers of chemicals were destroyed or damaged by the fire. Based upon field observations by EPA, this inventory

may have underestimated the amount of containers within the undamaged buildings. In addition, one area damaged by fire contains an electrical transformer which will require testing and asbestos coated piping beneath fire-damaged roofing.

The Site is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. § 9601(9). Due to the unsecured nature of the Site, the proximity to local populations, the CERCLA hazardous substances there and the release or threatened release of hazardous substances, EPA has determined that the Site presents a threat to human health and the environment and that a removal action, as defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21), is required.

2. Physical location

The Site is located in a mixed heavily industrial and residential area of Buffalo known as Black Rock. The Site is approximately four acres in size and encompasses 204-260 Chandler Street along the north side of Chandler Street and 207 Chandler Street located on the south side of Chandler Street. The drums of hazardous substances and asbestos pipes are situated within the Site buildings. Some of the drums and containers are intact, while others have been fire-damaged. The Site property is predominantly covered with buildings which are interconnected, with the exception of 207 Chandler, which is across the street. While some of the Site buildings were used as offices, the vast majority housed various manufacturing processes. To the north of the Site is a CSX railroad right-of-way with several active rail lines. To the south of the Site are several business and residential homes. To the west of the Site are several businesses and to the east of the Site are a parking area, residential properties and a business establishment.

Approximately 300 residences, housing an estimated 700 people are situated within 1/8 mile of the Site.

3. Site characteristics

The Buffalo Weaving and Belting Company (Buffalo Weaving) began sheet rubber and textile/rubber belting manufacturing operations at the Site in 1892. In January 1995, Buffalo Weaving was purchased by PharGo, LLC (PharGo) which continued to produce rubber and belting products. In January 2003, PharGo ceased all operations at the facility. In February 2003, Buffalo Economic Renaissance Corporation, which held a mortgage on the property, secured the facility by boarding and locking Site buildings in order to protect assets at the facility.

The fire of April 15 and 16, 2003 destroyed and heavily damaged the former rubber manufacturing areas in the western portion of the Site. Of the estimated 250,000 square feet of manufacturing and office space on-Site, approximately 90,000 square feet is fire-damaged and/or destroyed. Other areas of the Site contain hazardous substances as indicated in the Site inventory and evidence of recent vandalism and illegal entry exist.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The facility inventory provided to EPA by the City of Buffalo and samples taken by EPA from suspected asbestos pipe wrap on piping which leads to fire-damaged areas include the following hazardous substances, as defined by Section 101(14) of the CERCLA, as amended, 42 U.S.C. §9601, et seq.

Material	Quantity	Storage Method	Primary Hazard	Statutory Source for Designation as a Hazardous Substance
Asbestos	Over 5,000 linear feet	Hanging from pipes and within fire-debris	Carcinogen	1,2
Methyl Ethyl Ketone	550 gallons	55-gallon drums and 5 gallon pails	Flammable	3
Toluene	346 gallons	55-gallon drum, 5 gallon pails and one gallon containers	Flammable	3
Trichloroethane	55 gallons	55-gallon drum	Carcinogen	3
Ammonia Hydroxide	13 gallons	1 gallon containers	Toxic and corrosive	2,3
Laboratory Chemicals including toluene and other solvents	300 containers	300 containers varying in size from 1 pint to five - gallons	Flammable (D001)	3

Notes: 1 - CWA Section 307(a)

2 - CAA Section 112

3 - RCRA Section 3001

A 10,000-gallon underground storage tank, suspected to contain fuel oil, may be located within the fire-damaged building areas.

A 1,000-gallon tank of unknown materials is elevated above fire-damaged building supports in close proximity to the fire debris.

An electrical transformer has been sighted within the fire debris.

EPA analysis of pipe wrap on pipes leading into the fire-damaged Site buildings indicate the presence of friable asbestos. The first sample collected contained 29% chrysotile and 29% amosite asbestos fibers. The second sample collected contained 18% chrysotile and 18% amosite asbestos fibers. The asbestos in the buildings is in poor condition and some of it has collapsed onto the floors. The buildings damaged by the fire are collapsed onto some of the asbestos piping. Further collapse of buildings may cause asbestos to be released into the environment. Asbestos is designated as a CERCLA hazardous substance under 40 CFR §302.4 when it is friable. Friability is the ease with which a material can be crumbled, pulverized or reduced to powder, when dry, by hand pressure. The more easily that a material crumbles, the greater the potential for fiber release. Once released, asbestos fibers have the ability to remain airborne for an extended period of time. Much of the asbestos-containing material in the buildings on-Site is extremely friable due to its age, exposure to the elements, damage by fire and damage by fire fighting water. Sample results from the pipe insulation containing asbestos are included as Attachment 2.

The collapsed buildings, their fire-damaged structural components, and broken windows represent mechanisms for release of asbestos fibers into the environment. When asbestos-containing materials (ACM) are exposed to the elements, the potential for the migration of asbestos fibers is significantly increased.

Since the drums and fire-damaged debris piles are not properly contained and segregated by chemical compatibility, a threat to public health and welfare exists. The release of hazardous substances could result in the exposure of the neighboring population to hazardous substances through additional fire and/or explosion, direct contact and/or through migration of contamination.

This removal action addresses the disposal of hazardous substances from the Site. The facility inventory provided by the City of Buffalo is included as Attachment 3.

5. NPL status

The Site is not listed on the NPL, and there are no efforts underway to include the Site on the NPL.

6. Maps, pictures, and other graphic representations

Figures 1, 2, and 3 are included as Attachment 4 and provide the location and configuration of the Site. Figures 4 through 9 are aerial photographs of the Site taken after the fire showing the damaged sections of buildings, the entire building complex and the adjacent residential community.

B. Other Actions to Date**1. Previous actions**

There have been no previous EPA removal actions performed at the Site. Prior to EPA's involvement, there were no significant actions taken by any governmental agency with respect to cleanup or spills at the Site.

Buffalo Weaving worked with Linde Air Products in the 1940's and developed and produced non-radioactive material for the Oak Ridge Gaseous Diffusion Plant under contract with the Atomic Energy Commission. The US Department of Energy (DOE) researched the Chandler Street Plant and determined that no radioactive materials were used at the Site. Therefore, the DOE determined that no further actions were necessary under DOE's Formerly Utilized Sites Remedial Action Program (FUSRAP). EPA has screened Site debris from the fire and has found no radiation above background levels. EPA will continue to screen the Site as a precaution.

In 2001, PharGo entered a guilty plea on a misdemeanor count of making false certifications to the US Government under US defense contracts. The company was fined \$16,000 for the offense.

2. Current actions

As a result of the fire which occurred on April 15 and 16, 2003, the City of Buffalo erected concrete barricades along Chandler Street and in the rear of the Site buildings to prevent vehicles and pedestrian traffic from getting close to the fire-damaged building. EPA mobilized to the Site on April 18, 2001 and began 24-hour Site security, and provided fencing to fortify restrictions on Site access.

C. State and Local Authorities' Role**1. State and local actions to date**

As a result of Site conditions, the NYSDEC and the City of Buffalo requested that EPA undertake a removal action at the Site.

2. Potential for continued State/local response

There are no actions being taken by State or local government agencies to address the stabilization or disposal of hazardous substances located at the Site.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include:

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;

The fire has caused the buildings to be exposed to the elements. As the buildings damaged by the fire continue to deteriorate, the potential for release of friable asbestos increases. Since the Site has been damaged by vandals in the past, the drums and laboratory chemicals present a threat of exposure from trespassing or arson.

The elevated tank with unknown materials near the fire-damaged buildings and the suspected underground storage tank in close proximity to the fire area pose a threat of release.

Many of the drums are in poor condition and stored haphazardly throughout the Site buildings. Trespassers at the Site could be adversely impacted by contact with the hazardous substances contained in these drums.

(iii) Hazardous substances, or pollutants, or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;

The drums, tank and other containers found at the Site contain the hazardous substances as listed in Section II.A.4 of this Action Memorandum. The hazardous substances within these containers present a threat of release.

(v) Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released;

Five Site buildings are partially demolished and subjected to changes in weather conditions. Snow melt, wind, and rainfall will contribute to the decay of the building structure and may cause the roof to further collapse, causing further deterioration to the containers of hazardous substances and asbestos piping. Contaminated runoff from the Site could flow into storm sewers and eventually reach the groundwater.

(vi) Threat of fire or explosion; and

The facility inventory provided by the City of Buffalo indicated the presence of drums and smaller-sized containers of flammable liquids. During EPA's RSE, drums containing flammable liquid labels were visible and intact within the fire-damaged Site buildings. Though a significant

fire and resultant explosions have already occurred within the Site buildings, a continuing threat remains at the Site.

- (vii) **The availability of other appropriate federal or State response mechanisms to respond to the release.**

No other federal or State response mechanism is available to respond to the significant threat which the Site presents.

B. Threats to the Environment

The conditions at the Site meet the criteria for a CERCLA removal action under 40 CFR Part 300.415(b)(2) of the National Contingency Plan. Factors that support conducting a removal action at the Site include: -

- (i) **Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants;**

The drums and tanks containing hazardous substances and waste in the fire-damaged buildings continue to present a threat to the environment. Releases from leaking drums and tanks have occurred and may continue to occur at the Site. Storm sewers run through the center of the fire-damaged Site and connect to the City of Buffalo waste water treatment plant which discharges to groundwater. Releases from the Site could adversely impact the environment. Fire or explosion could result in adverse impacts to the air.

- (v) **Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released; and**

The Site buildings damaged by fire require demolition and are subject to changes in weather conditions. Snow melt, wind and rainfall will continue to contribute to the decay of the building structures and may cause the roof to further collapse causing further deterioration to the containers of hazardous substances. Contaminated runoff from the Site could flow into the storm sewers and eventually reach the groundwater.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

V. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed action description

The following activities are proposed to address the immediate threats to human health and the environment posed by hazardous substances, or pollutants, or contaminants present at the Site.

- a. Dismantling of Fire-damaged Buildings - EPA will begin dismantling the fire-damaged buildings and will send the fire debris for off-Site disposal.
- b. Removal of Drums and Containers from Fire-damaged Buildings - As containers within the fire-damaged buildings are reached during the dismantling operation, the containers will be stabilized and removed from the fire debris and building. EPA will utilize a centralized and secure area on-Site to stage the drums removed from the fire-damaged buildings. Container sampling will be performed, as well as, off-Site disposal, as appropriate.
- c. Removal of Asbestos Piping and Debris - As the fire-damaged buildings are dismantled, EPA will carefully remove fire debris in proximity to asbestos piping. When asbestos piping is exposed, an encapsulant will be applied to the asbestos to limit the potential for friable asbestos fibers to be released. Encapsulant binds the asbestos particulates into a mass and limits the potential for release. After the encapsulant is applied, the piping and/or the asbestos will be placed into a container suitable for disposal of asbestos containing materials and will be sent for off-Site disposal at an appropriate disposal facility.
- d. Collection of Drums and Other Containers from All Site Buildings - The Site inventory provided to EPA, and field observations of undamaged Site buildings, have indicated the other Site buildings contain drums and other containers of hazardous substances. EPA will move these containers into the on-Site staging area that is used for containers removed from the fire-damaged buildings. Container sampling will be performed as well as off-Site disposal, as appropriate.
- e. Staging and Segregation of Site Chemicals - All containers that are open or of questionable integrity will be over-packed or transferred into new containers. Containers will be placed in compatible waste groups and placed into a secure area of the Site.
- f. Removal of Site Tanks in Close Proximity to Fire-damaged Areas - One above ground elevated storage tank containing 1,000 gallons of unknown materials is adjacent to the fire-damaged Site buildings. A 10,000-gallon underground storage tank may be beneath the fire debris at the Site. EPA will access these tanks, sample the contents and remove them as necessary.
- g. Assessment of Electrical Transformers On-Site - The Site power has been shut off and the

Site contains electrical transformers in various stages of condition and age. The oil from these electrical transformers and equipment will be sampled. If PCBs are contained within the electrical equipment, removal will be necessary. One transformer is located within the fire-damaged area of the Site and will immediately be removed and sampled.

- h. Sampling - All containers, including tanks and drums, will be sampled for disposal analysis parameters. Where possible, composite samples will be taken to reduce the total amount of samples analyzed. None of the Site containers are accessible for sampling at this time. Once they are accessible, each will be opened and sampled. Samples will be sent off-Site for analysis. If the containers contain hazardous substances, then EPA will remove the tanks and drums, and perform soil removal or area decontamination, if necessary.
- i. Analysis - All samples will be evaluated for compatibility. The samples will be analyzed for disposal parameters, including Toxicity Characteristic Leaching Procedure (TCLP) and other types of analysis.
- j. Disposal - Upon receipt of disposal analysis, waste profiles will be completed and sent to disposal facilities for acceptance. Compatible materials will be sent to off-Site disposal facilities in compliance with EPA's Off-Site Disposal Rule.
- k. Evaluation of Building Areas Undamaged by Fire - Within the Site buildings that were not damaged, some areas appear to have had electrical equipment and transformers dismantled. EPA will sample and evaluate these and other areas within the Site and conduct removal actions as necessary. In addition, other areas in the undamaged buildings contain suspected asbestos that is falling off piping and structural support steel. EPA will sample suspect ACM and if necessary, abate the asbestos and/or apply an encapsulant on the asbestos to minimize its release in the future.

2. Contribution to remedial performance

The Site is not presently on the NPL. The response measures proposed in this Action Memorandum will address significant threats posed to public health through removal of hazardous substances. The proposed action will contribute effectively to any long-term remedial action with respect to the release or threatened release of hazardous substances at the Site.

3. Description of alternative technologies

Because of the quantities and types of the hazardous substances and/or wastes at the Site, on-Site treatment and/or incineration is not appropriate. The selected removal action includes the characterization of hazardous substances found at the Site and the transportation of hazardous substances off-Site for treatment and/or disposal. The selected removal action has been determined to be the appropriate response action for the Site based upon the criteria of effectiveness, implement ability and cost.

4. EE/CA

Due to the time-critical nature of this removal action, an EE/CA will not be prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs that are within the scope of this removal action will be met to the extent practicable. Federal ARARs determined to be applicable for the proposed scope of work include the Resource Conservation and Recovery Act, Occupational Safety and Health Act and Hazardous Materials Transportation Uniform Safety Act.

6. Project schedule

It is anticipated that the project will be completed within four to six months. Three phases will be implemented, each taking different time-frames to complete. Phase one will be mobilization to the Site, sampling as needed to determine fire impact to electrical transformer, dismantling of the fire-damaged buildings and removal and staging of the contents contained therein. Phase two will be the off-Site disposal of drums and tank waste containing hazardous substances from both the fire-damaged buildings and other buildings, decontamination of tanks and staging areas and sampling of areas of suspected soil contamination resulting from potential historic drum and tank spills, sampling of electrical equipment and sampling of debris piles. Phase three will address soil removal at spill areas, electrical transformer areas and debris piles, as necessary.

Estimated Costs:

The estimated costs for the completion of this project are summarized below. Detailed costs are included as Attachment 5.

Extramural Costs:

	<u>Verbal Funding Authorization</u>	<u>Ceiling Increase</u>	<u>Proposed Ceiling</u>
<u>Regional Allowance Costs:</u>			
ERRS Cost	\$ 50,000	\$ 620,000	\$ 670,000
15% contingency	<u>-0-</u>	<u>\$ 93,000</u>	<u>\$ 93,000</u>
Total ERRS Cost	\$ 50,000	\$ 713,000	\$ 763,000

Other Extramural Costs Not Funded From the Regional Allowance:

Total RST costs	<u>\$ 20,000</u>	<u>\$ 96,000</u>	<u>\$ 116,000</u>
SUBTOTAL, EXTRAMURAL COSTS	\$ 70,000	\$ 809,000	\$ 879,000

Extramural Cost Contingency (20%)	<u>-0-</u>	<u>\$ 162,000</u>	<u>\$ 162,000</u>
TOTAL, REMOVAL PROJECT CEILING	\$ 70,000	\$ 971,000	\$ 1,041,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

Should no action be taken or the planned action be delayed, hazardous substances such as asbestos in Site buildings, and hazardous substances contained in transformers, drums and tanks could be released. A release of hazardous substances from the Site could result in the exposure of the neighboring population and/or contamination of the environment. Releases of contaminants to the air and soil could increase the cost of the required removal action.

VII. OUTSTANDING POLICY ISSUES

No known outstanding policy issues are associated with the Site.

VIII. ENFORCEMENT

It appears that PharGo and the suspected arsonists are potentially responsible parties (PRPs) for the Site. Due to the conditions of the Site buildings and the immediate need to dismantle and stabilize the hazardous substances within the buildings, EPA will begin the Site work funded by the Superfund. However, EPA anticipates offering the PRPs the opportunity to dispose of drums and electrical transformers from the Site buildings, once EPA determines that they are segregated and staged in a secure location on-Site. EPA will attempt to identify additional PRPs and pursue cost-recovery, as appropriate, concurrently with the time-critical removal action requested herein.

Enforcement Cost Estimate

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,464,000. This figure includes direct intramural and indirect costs.

Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of Site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

EPA's Total Estimated Project-Related Costs

\$1,041,000 + \$100,000	\$1,141,000
Direct Extramural and Intramural Costs	

	+	
28.32% (Region-specific Indirect Cost Rate) x \$1,141,000		<u>\$ 323,000</u>

Estimated EPA Costs for Removal Action that are Eligible for Cost Recovery	\$ 1,464,000
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IX. RECOMMENDATION

This decision document represents the selected removal action for the Buffalo Weaving and Belting Company Site in the City of Buffalo, New York, developed in accordance with CERCLA, as amended, and is consistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and is recommended for your approval of the proposed removal action. The total project ceiling for this removal action, if approved, will be \$1,041,000. Of this, an estimated amount of \$763,000 will come from the FY-03 Regional Advice of Allowance for mitigation contracting.

Please indicate your approval, or disapproval, and authorization of funding as per current Delegation of Authority, by signing below.

APPROVAL: William M. Calu **DATE:** 5/5/03
 George Pavlou, Director
 Emergency and Remedial Response Division

DISAPPROVAL: _____ **DATE:** _____
 George Pavlou, Director
 Emergency and Remedial Response Division

cc: (after approval is obtained)

G. Pavlou, ERRD-D
 W. McCabe, ERRD-DD
 R. Salkie, ERRD-RAB
 J. Rotola, ERRD-RAB
 J. Witkowski, ERRD-RAB
 G. Zachos, ACM/O
 R. Dease, ERRD-RPB
 P. Simon, ORC-NYCSUP
 L. McDavid, ORC-NYCSUP
 B. Bellow, CD
 R. Worley, 5202G

R. Manna, OPM-FMB
P. McKechnie, OIG
C. Rudick, NYSDEC
E. Christman, NOAA
A. Raddant, DOI
C. Kelley, RST

Attachment 1

NYSDEC Referral

New York State Department of Environmental Conservation
Division of Environmental Remediation, 12th Floor
625 Broadway, Albany, New York 12233-7011
Phone: (518) 402-9706 • FAX: (518) 402-9020
Website: www.dec.state.ny.us



April 23, 2003

Mr. George Pavlou
Director
Emergency & Remedial Response Division
United States Environmental Protection Agency, Region II
290 Broadway
New York, New York 10007-1866

Dear Mr. Pavlou:

RE: Former Buffalo Belt & Webbing
Buffalo (C), Erie County

The New York State Department of Environmental Conservation (Department) hereby requests the United States Environmental Protection Agency (USEPA) perform an appropriate CERCLA emergency response action at the former Buffalo Belt and Webbing facility located at 204-260 Chandler Street, Buffalo, New York.

The facility consists of six large multi-story buildings, portions of which have been unused for several years. The remaining portions were used for the manufacture of rubber belting and webbing products through the end of 2002.

A large fire in a significant portion of the complex occurred in the late evening of April 15, 2003. The fire was extinguished by April 16, 2003, leaving an unsecured, structurally unstable site. A recent inventory of the facility conducted prior to the fire by the mortgage holder, Buffalo Economic Renaissance Corporation, indicates the presence of approximately 100, 55-gallon drums containing potentially hazardous materials/substances including but not limited to oils, waste oils, hydraulic fluids, solvents, phenolic resins and unidentified cleaners. Inspections by Department staff conducted on April 17, 2003 indicate that some of the drums were not impacted by the fire, but are now unsecured and unprotected. Remnants of potentially hazardous wastes/substances may also remain in the fire zone. In addition, an estimated 50 smaller containers of similar materials were on-site.

If you have any questions regarding this request, please contact Mr. Daniel King, of my staff, in Buffalo at (716) 851-7220.

Sincerely,

Salvatore Ervolina

for Dale A. Desnoyers
Director
Division of Environmental Remediation

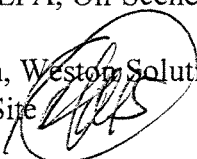
cc: Dan King

Attachment 2

Asbestos samples of pipes leading into fire
damaged building

MEMORANDUM

TO: Kevin Matheis, USEPA, On-Scene Co-ordinator

Fr: Howard M. Syvarth, ~~Weston Solutions Inc.~~, Site Project Manager, Buffalo Belting and Weaving Co., Site 

Date: April 24, 2003

RE: Summary of Analytical Results for Bulk Samples Collected on Tuesday 4/22/03

Weston Solutions' Removal Support Team performed an entry into the Buffalo Belting and Weaving Co., building on Tuesday afternoon April 22, 2003. The initial entry was conducted using a Multi-Rae plus toxic gas meter. This particular monitoring device measures Oxygen content, % of Lower Explosive Limit, (%LEL), carbon monoxide gas and hydrogen sulfide gas. All reading were at the background level in the structure. Back ground levels being 20.8% oxygen, 0% LEL, and 0 parts per million (ppm) for both hydrogen sulfide and carbon monoxide. The direct monitoring reading instruments were calibrated prior to departure on Monday April 21, 2003

Two bulk samples were collected and submitted to the laboratory for analysis.

On April 24th, the analytical results for the samples were received by Weston Solutions and reviewed. The table below summaries the analytical results for the samples collected. See attached diagram for the sampling locations.

Sample Number	Sample Location	Results
BBW-01B	piping along ceiling in room adjacent to fire damage	18.0% Chrysotile 18.0 % Amosite
BBW-02	piping along ceiling in room adjacent to fire damage	29.0% Chrysotile 29.0 % Amosite

EMSL Analytical, Inc.

490 Rowley Road, Depew, NY 14043

Phone: (716) 651-0030 Fax: (716) 651-0394 Email: buffalolab@emsl.com**EMSL**

Attn: Smita Sumbaly
Weston Solutions
1090 King Georges Post Road
Suite 201
Edison, NJ 08837-3703

Fax: (732) 225-7037

Phone: 732-225-6116 X210

Project: 3356

Customer ID: RFWE53
Customer PO: 0038635
Received: 04/23/03 8:15 AM

EMSL Order: 140301423

EMSL Project ID:

Analysis Date: 4/23/2003

Asbestos Analysis of Bulk Materials by PLM via the NY State ELAP 198.1 Method

Sample	Location	Appearance	Treatment	Non-Asbestos		Asbestos
				% Fibrous	% Non-Fibrous	% Type
BBW-01B 140301423-0007		Gray Fibrous Homogeneous	Teased		64.00% Non-fibrous (other)	18.00% Chrysotile 18.00% Amosite
BBW-02B 140301423-0008		Gray Fibrous Homogeneous	Teased		42.00% Non-fibrous (other)	29.00% Chrysotile 29.00% Amosite

Eric Fischer

Analyst

Kenneth Najuch
or other approved signatory

PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Negative PLM results cannot be guaranteed. Samples reported as <1% or none detected should be tested with TEM. The above test report releases only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL Analytical, Inc. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government.

Analysis performed by EMSL Buffalo (NVLAP #200056-0) NY ELAP #11608

PLM Point Count-1

THIS IS THE LAST PAGE OF THE REPORT

140301423

RFP No.: 3356
PO No.: 0038625

CHAIN OF CUSTODY RECORD



REMOVAL SUPPORT TEAM
EPA CONTRACT 68-W-00-113
Phone: 732-225-6116 Fax: 732-225-7037

Matrix Box No.:
1. Surface Water
2. Ground Water
3. Leachate
4. Rinseate
5. Soil/Sediment
6. Oil
7. Waste
8. Other (Specify)

Preservative Box No.:
1. HCl
2. HNO3
3. Na2SO4
4. H2SO4
5. Other (Specify)
6. Ice Only
N. Not Preserved
* See Comments

Send verbal and written results to: Weston Solutions, Inc., USEPA Region II RST
Suite 201, 1090 King Georges Post Road, Edison, New Jersey 08837-3703
Attention: Smita Sumbaly, RST Analytical Coordinator

Sample Number	Sample Collection MM/DD/YYYY/Time	Sample Matrix (Enter box #)	Conc. Low-L Med-M High-H	Sample Type Comp-C Grab-G	Sample Preserv. (Enter box #)	RAS ANALYSIS					RCRA ANALYSIS				OTHER
						VOA	BNA	PEST	PCBs	TAL	CN	IGN	COR	REAC	
BBW-01A	4/22/03 1730	AIR	L	C	N/A										Asbestos Vol: 7382
BBW-02A	4/22/03 1735														Asbestos Vol: 7562
BBW-03A	4/22/03 1800														Asbestos Vol: 7382
BBW-04A	4/22/03 1745														Asbestos Vol: 7202
BBW-05A	4/22/03														FIELD H2O H2O
BBW-06A	4/22/03														LOT BLANK
BBW-01B	4/22/03	BULK	H	G											Asbestos
BBW-02B	4/22/03	BULK	H	G											Asbestos

Comments: 24 hr TAT for ALL samples. PLM/TEM + PCM (+/- a/ 72 hr
ENUMERATION)

Person Assuming Responsibility for Sample: Howard Smith
Time Date (MM/DD/YYYY): 4/22/03 1730

Sample Number: ALL	Relinquished By: [Signature]	Time: 0730	Date: 4/22/03	Received By: Howard	Reason for Change of Custody: ANALYSIS
Sample Number:	Relinquished By:	Time:	Date:	Received By:	Reason for Change of Custody:
Sample Number:	Relinquished By:	Time:	Date:	Received By:	Reason for Change of Custody:

Weston Solutions, Inc.
FEDERAL PROGRAMS DIVISION

In Association with Resource Applications, Inc., R.E. Samiera Associates, PRC Environmental
Management, C.C. Johnson & Malhotra, P.C., and GRB Environmental Services, Inc.

Attachment 3

Site inventory prior to fire and post fire inspection
report

Former Buffalo Weaving and Belling Facility
Inventory Sorted by Path Taken during Site Walkthrough

ID	Waste	Number Containers	Container Material	Container Type	Container Size	Units	Total Volume	Hazardous?	Photo	Notes
Room 1	Chemlock 607	1	Steel	Drum	55	Gallons	55		1	Adhesive UN1133
	#8 Fuel Oil plus Speedi-Dry	8	Steel	Drum	55	Gallons	440		-	
Room 2	Naphtha	1	Steel	Drum	55	Gallons	55		2	
	Phenolic Resins	2	Paper	Bag	50	Pounds	50		3, 4	
	Carbon Black	6	Paper	Bag	50	Pounds	150		3, 4	
	Calcined Kaolin	2	Paper	Bag	50	Pounds	50		3, 4	
	Petroleum Cake	1	Paper	Bag	50	Pounds	15		3, 4	
	Various Resins	11	Paper	Bag	50	Pounds	275		3, 4	
	Hydrated Alumina	2	Paper	Bag	50	Pounds	100		3, 4	
	Hydraulic Oil	1	Steel	Drum	55	Gallons	30		5	
	Hydraulic Oil	1	Steel	Drum	55	Gallons	55		6	
	Waste Oil	2	Steel	Drum	55	Gallons	110		7	
	Talcum Powder	2	Steel	Cans	5	Gallons	5		8	
	Talcum Powder	3	Cardboard	Drum	30	Gallons	15		9	
	Hydraulic Oil	1	Steel	Drum	55	Gallons	55		10	
Drum Room	Methyl ethyl ketone (MEK)	5	Steel	Drum	55	Gallons	275		11 - 16	
	Toluol	1	Steel	Drum	55	Gallons	55		11 - 16	
	ICE	1	Steel	Drum	55	Gallons	55		11 - 16	
	Naphtha	4	Steel	Drum	55	Gallons	55		11 - 16	
	Waste Liquids	7	Steel	Drum	55	Gallons	385		11 - 16	Mixture of fluids found in this room
	Toluene	16	Glass	Bottle	1	Gallons	16		11 - 16	
	Chemlock	20	Steel	Cans	5	Gallons	100		11 - 16	
	Methyl ethyl ketone (MEK)	5	Steel	Cans	5	Gallons	25		11 - 16	
	Toluol	5	Steel	Cans	5	Gallons	25		11 - 16	
	Various Liquids	30	Steel	Cans	5	Gallons	150		11 - 16	
	Various Liquids	10	Glass	Cans	1	Gallons	10		11 - 16	
	Various Liquids	10	Steel	Cans	1	Gallons	10		11 - 16	
	Hydraulic Oil	7	Steel	Drum	55	Gallons	385		17	
	Darvan 1	1	Steel	Drum	55	Gallons	55		-	A soap
Lab 1	Unknown Liquids	3	Plastic	Cans	1	Gallons	3		18	Franklin Indust ALW-3626, DKW-3396
	Ammonium Hydroxide	1	Glass	Cans	1	Gallons	1		-	
	Methanol	2	Glass	Cans	1	Gallons	2		-	
	Polyack	1	Glass	Cans	1	Gallons	1		-	
										Various container sizes, various contents, including petroleum products, solvents, adhesives (chemlock), and powders (metal oxides, sulfur, naugawhite, kaolin clay, caruba wax)
Lab 2	Various small containers	250	Various	Cans	0.5	Gallons	125		19 - 26	
	Various liquids	20	Various	Cans	1	Gallons	20		19 - 26	Toluol, naphtha, trimethyl pentane, dimethylformaldehyde, alcohol
Lab 3	Ammonia	12	Glass	Bottle	1	Gallons	12		27	
	Various liquids	10	Steel	Cans	1	Gallons	10		27	MEK, Toluol, acetone
	Diamine	1	Plastic	Pail	5	Gallons	5		27	Versailing P-1000 Oligomeric Diamine
Office	Urethane	2	Plastic	Pail	5	Gallons	10		-	

Former Buffalo Weaving and Dolling Facility
Inventory Sorted by Path Taken during Site Walkthrough

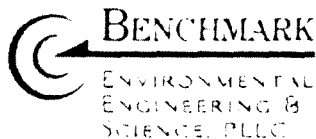
ID	Waste	Number Containers	Container Material	Container Type	Container Size	Units	Total Volume	Hazardous?	Photo	Notes
Rubber House	Waste oil	2	Steel	Drum	55	Gallons	110		28 - 30	
	Synthetic oil (mixing oils)	16	Steel	Drum	55	Gallons	880		28 - 30	Used for Making Rubber - like paraffin
	Powders	12	Cardboard	Drum	25	Gallons	150		31	
Boiler Room	Return Line Treatment	2	Steel	Drum	55	Gallons	110		-	Disinfectant
	Paint Cans	12	Steel	Cans	1	Gallons	12		-	
	Petroleum non detergent	1	Plastic	Pail	5	Gallons	5		-	
Maint Shop	Tower Treatment	1	Plastic	Pail	5	Gallons	5		-	Disinfectant
	Hydraulic Oil	1	Plastic	Pail	5	Gallons	5		-	
	Hydraulic Oil	1	Steel	Drum	25	Gallons	25		32	
Machine Shop	Cutting Oil	1	Steel	Drum	25	Gallons	25		33	
	Cutting Oil	9	Steel	Drum	55	Gallons	495		34, 35	
	Non-Bulky Cleaner	4	Glass	Bottle	1	Gallons	4		34, 35	
	Oils	20	Plastic	Pail	5	Gallons	100		34, 35	
	Various small containers	12	Various	Cans	0.5	Gallons	6		34, 35	Oil and paint cans
	Flashing Cement	1	Plastic	Pail	5	Gallons	5		-	
	Car batteries	12	Plastic	Battery	1	Each	12		-	
Auto Garage (first floor)	Waste motor oil	3	Steel	Drum	55	Gallons	165		-	
	Waste motor oil	1	Steel	Drum	25	Gallons	25		-	
	Waste antifreeze	1	Steel	Drum	55	Gallons	55		-	
	Waste antifreeze	1	Plastic	Pail	5	Gallons	5		-	
	Various small containers	20	Various	Cans	0.5	Gallons	10		-	Carb cleaner, lubricants
Manufact Fac (second floor)	Waste Liquids	12	Steel	Drum	55	Gallons	660		38	
	Marking Ink	16	Steel	Cans	0.25	Gallons	4		37	Flammable
	Acid metal cleaner	1	Plastic	Bottle	1	Gallons	1		-	
	Hardener	50	Glass	Vials	0.01	Gallons	0.5		-	Rema TipTop RF-SC
	Hydraulic Oil	1	Steel	Drum	55	Gallons	55		-	

Assumed all containers are full unless otherwise noted

Assumed all gas containers (propane, etc) will be addressed separately (likely taken back by supplier)

Empty Drums Empty 5-gallon Pails (with residual materials)

	4	50
	10	
	1	
	12	
	20	
Sum	47	



50 Fountain Plaza
Buffalo, New York, 14202
Phone: (716) 856-0599
Fax (716) 856-0583

Memorandum

To: Paul Werthman, Benchmark

From: Bryan Hann

Date: 04/16/03

Cc: none

**Re: Buffalo Belt & Webbing Company
Site Reconnaissance**

As requested by the City of Buffalo Department of Public Works, this letter summarizes the findings of the site reconnaissance performed by Benchmark Environmental Engineering and Science, PLLC (Benchmark) personnel at the Buffalo Belt and Webbing Company Facility (Site) located on Chandler Street, Buffalo, New York. On April 16, 2003, Benchmark personnel conducted a visit to the site following a damaging fire to the main structure on the property the previous night. Upon arrival, Benchmark personnel met with Jim Poley (City of Buffalo Fire Department Battalion Chief). The Chief indicated the structure was not safe to enter, however visual surveillance could be conducted around the perimeter and along two hallways within the structure. The following bulletized list summarizes Benchmark's findings:

- Upon arrival, Benchmark observed a significant sheen on runoff water from the structure draining west down Chandler Street into the sanitary/storm sewer. The sheen may have been diesel or gasoline.
- Two areas within the structure observed by Benchmark contained several drums and buckets of what appeared to lubricating/hydraulic oils.
- One main storage room approximately 30 feet by 30 feet, labeled "highly flammable" with a fireproof door contained several drums labeled with various solvents. Mineral spirits, 1,1,1-trichloroethane,

methyl ethyl ketone and toluene were visually identified via labels. A few of the drums in this room were lying horizontal in cradles.

- From the back of the structure, Benchmark identified an above ground heating oil tank inside the building, approximately 550 gallons.

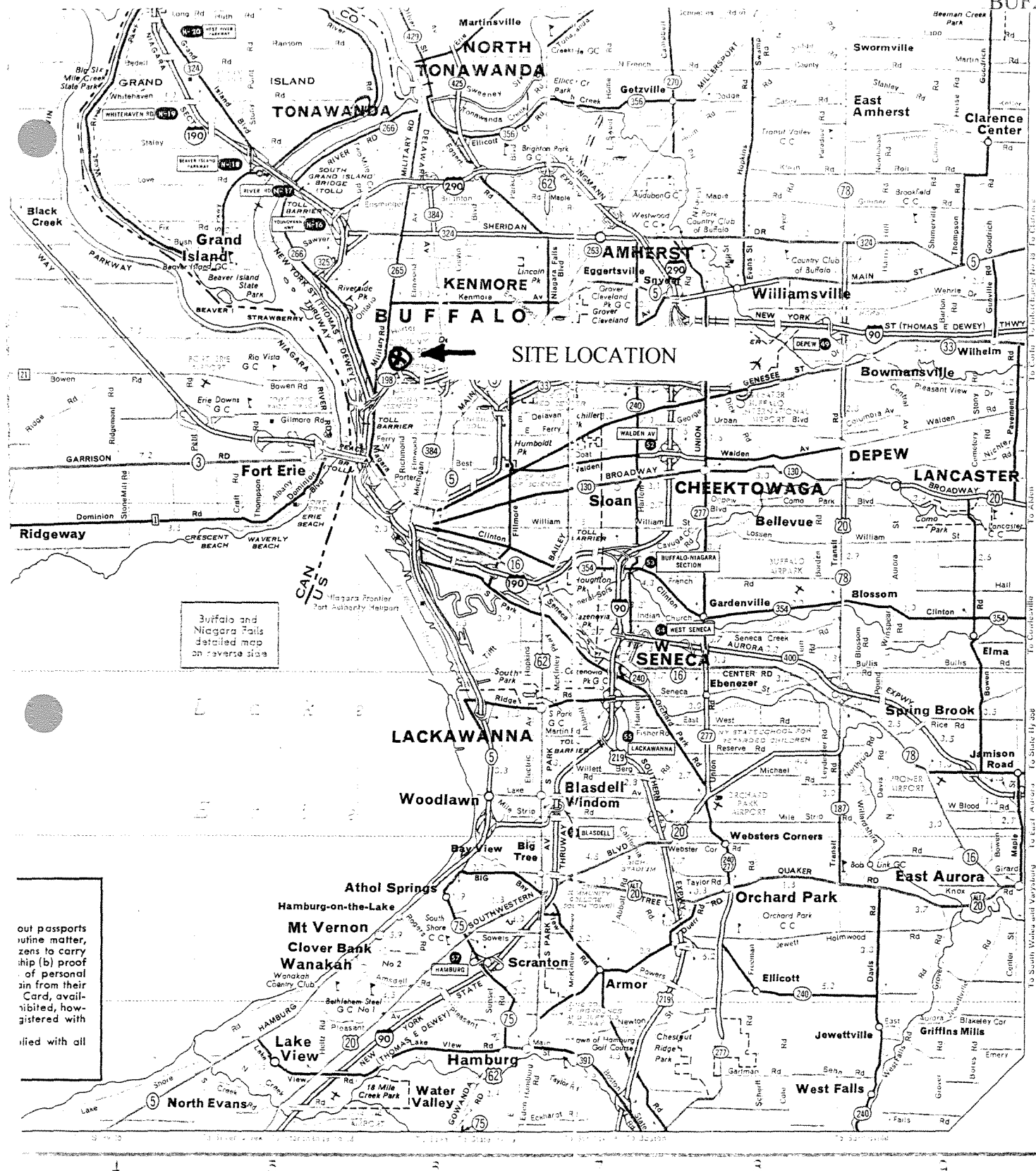
Initial reports of a "red" substance flowing from the facility were not observed by Benchmark. The on-duty Battalion Chief had not heard of the report and indicated he had just arrived at the scene in the morning.

Benchmark recommends the City take immediate action to secure the structure against vandalism and trespassing. In addition, a full inventory will need to be conducted to identify and quantify all hazardous/non-hazardous materials within the structure. Upon inventory and sample collection, all material will require proper disposal.

If you have any questions pertaining to the site reconnaissance activities presented herein, please feel free to call us at (716) 856-0599.

Attachment 4

Maps, pictures, and other graphical representations



out passports
outine matter,
zens to carry
ship (b) proof
of personal
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Figure 1
Buffalo Weaving Site
Site Location Map

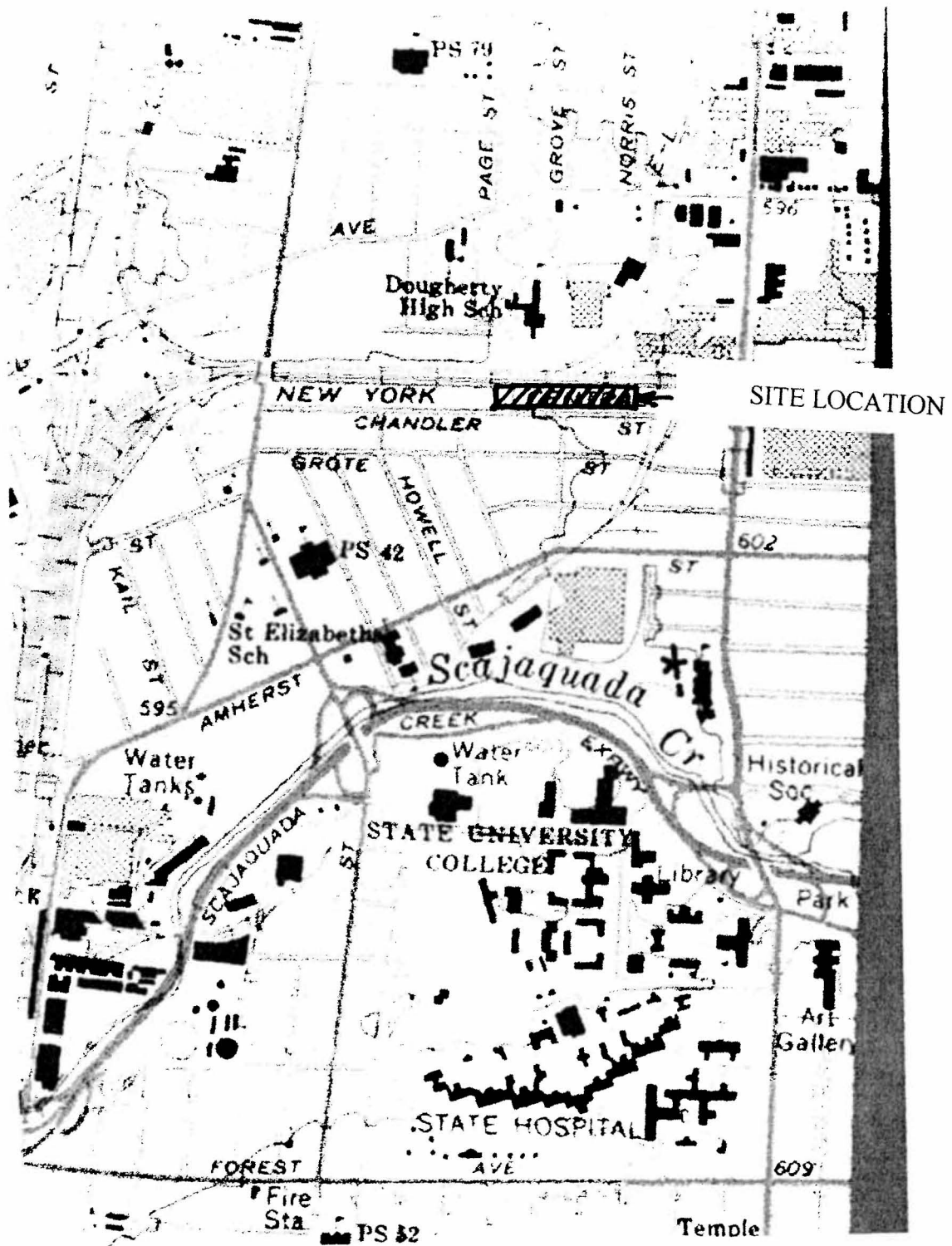


Figure 2
Buffalo Weaving Site
Site Location Map

VIEW LOOKING NORTH

Buffalo Weaving
Post fire Aerial Photo
Western Site Buildings



Site Buildings

Figure 4
Buffalo Weaving Site
Site Photograph

VIEW LOOKING NORTH

Buffalo Weaving
Post Fire Aerial Photo
Western Building

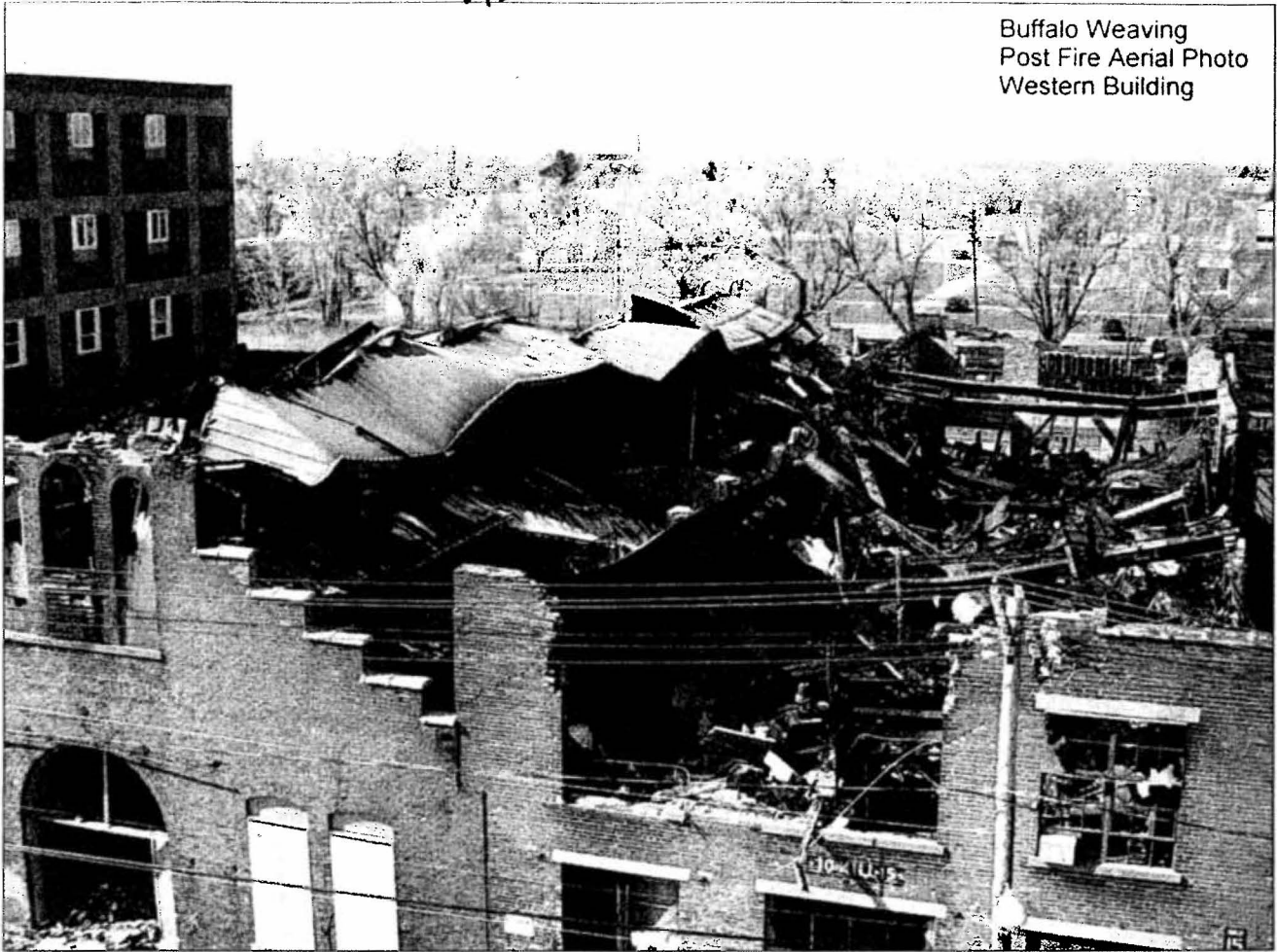


Figure 5
Buffalo Weaving Site
Site Photograph

VIEW LOOKING NORTH

Buffalo Weaving Site
Center of Fire Damaged Buildings

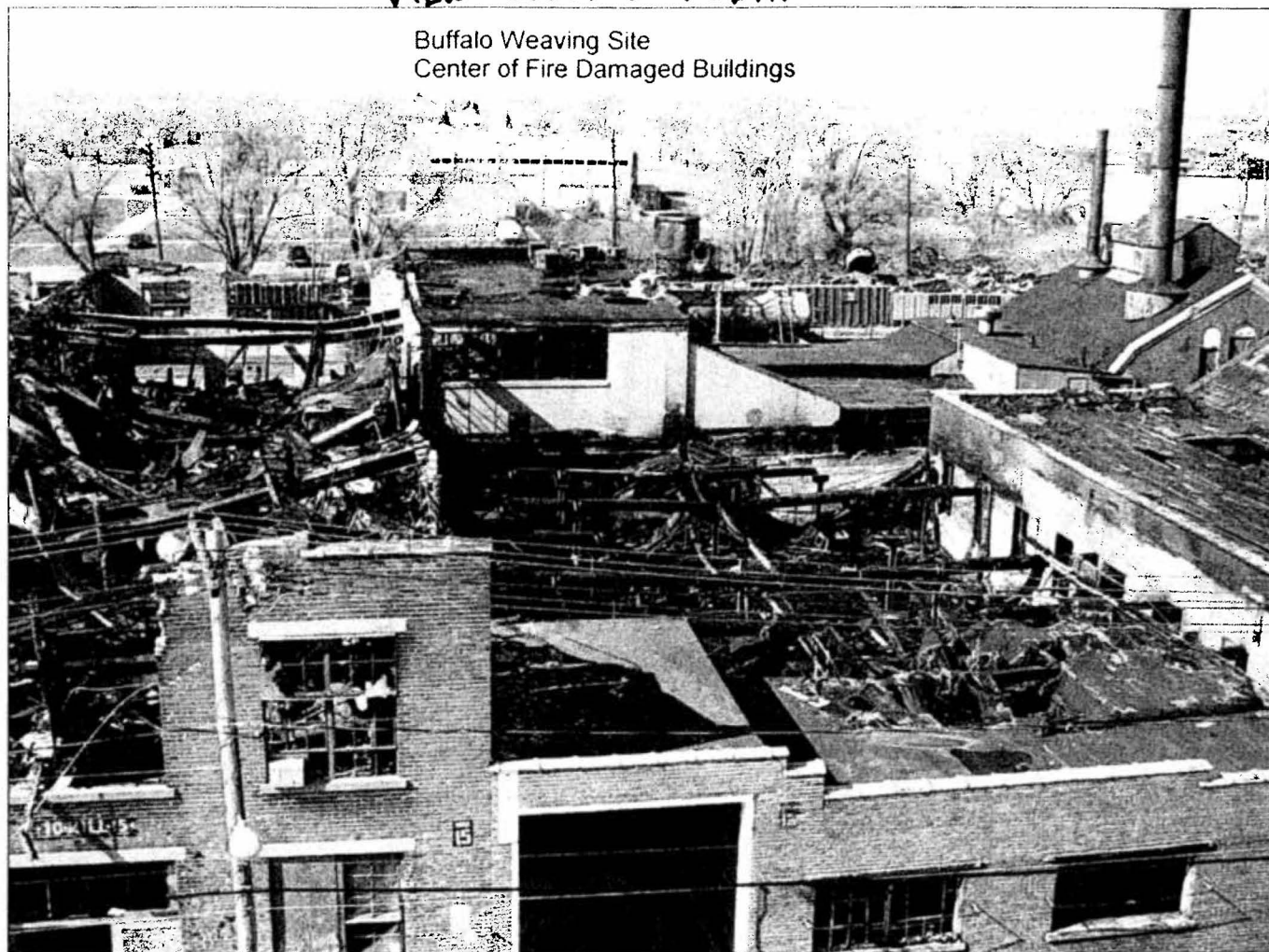


Figure 6
Buffalo Weaving Site
Site Photograph

VIEW LOOKING NORTHEAST

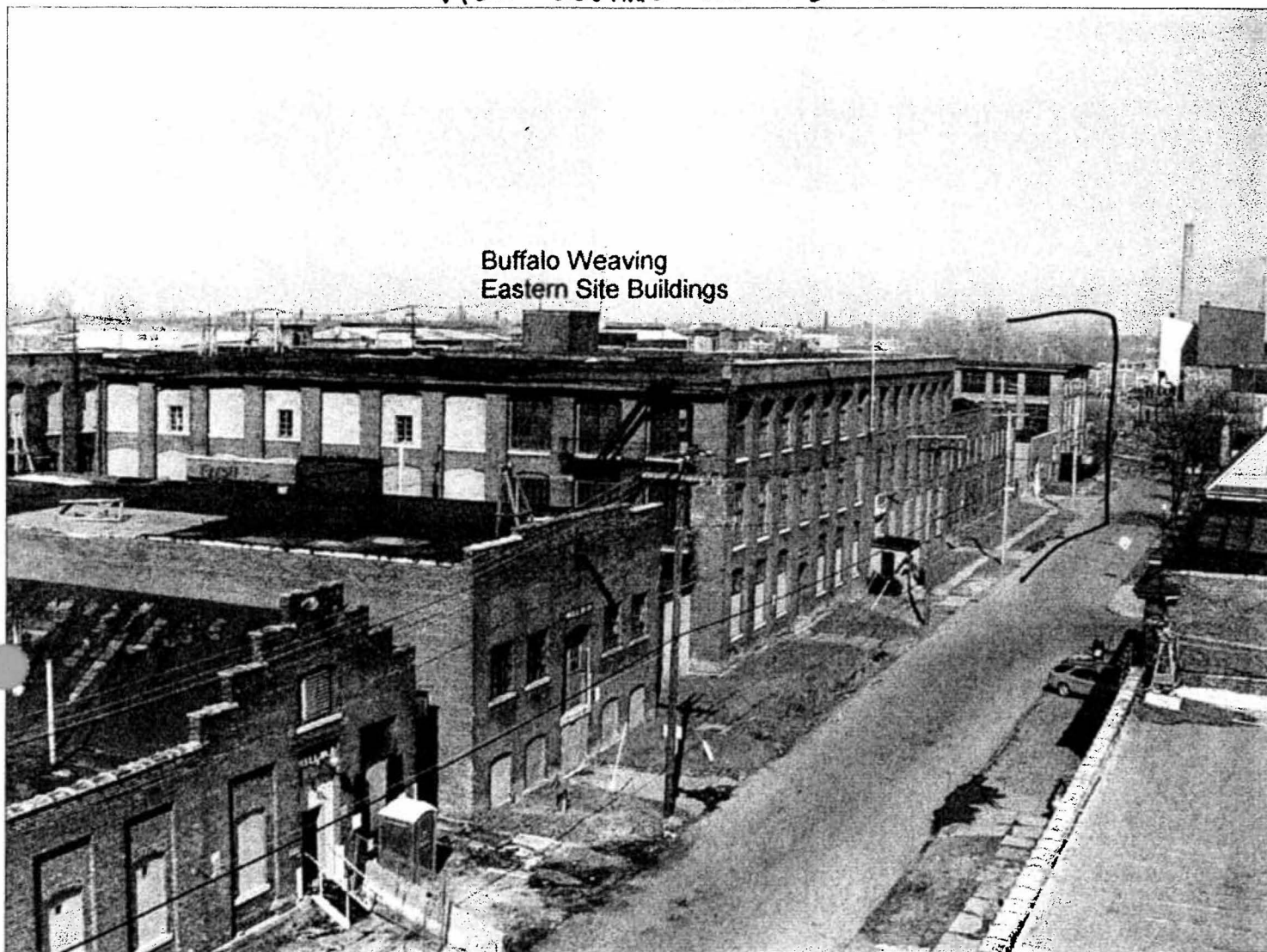


Figure 7
Buffalo Weaving Site
Site Photograph

VIEW LOOKING EAST

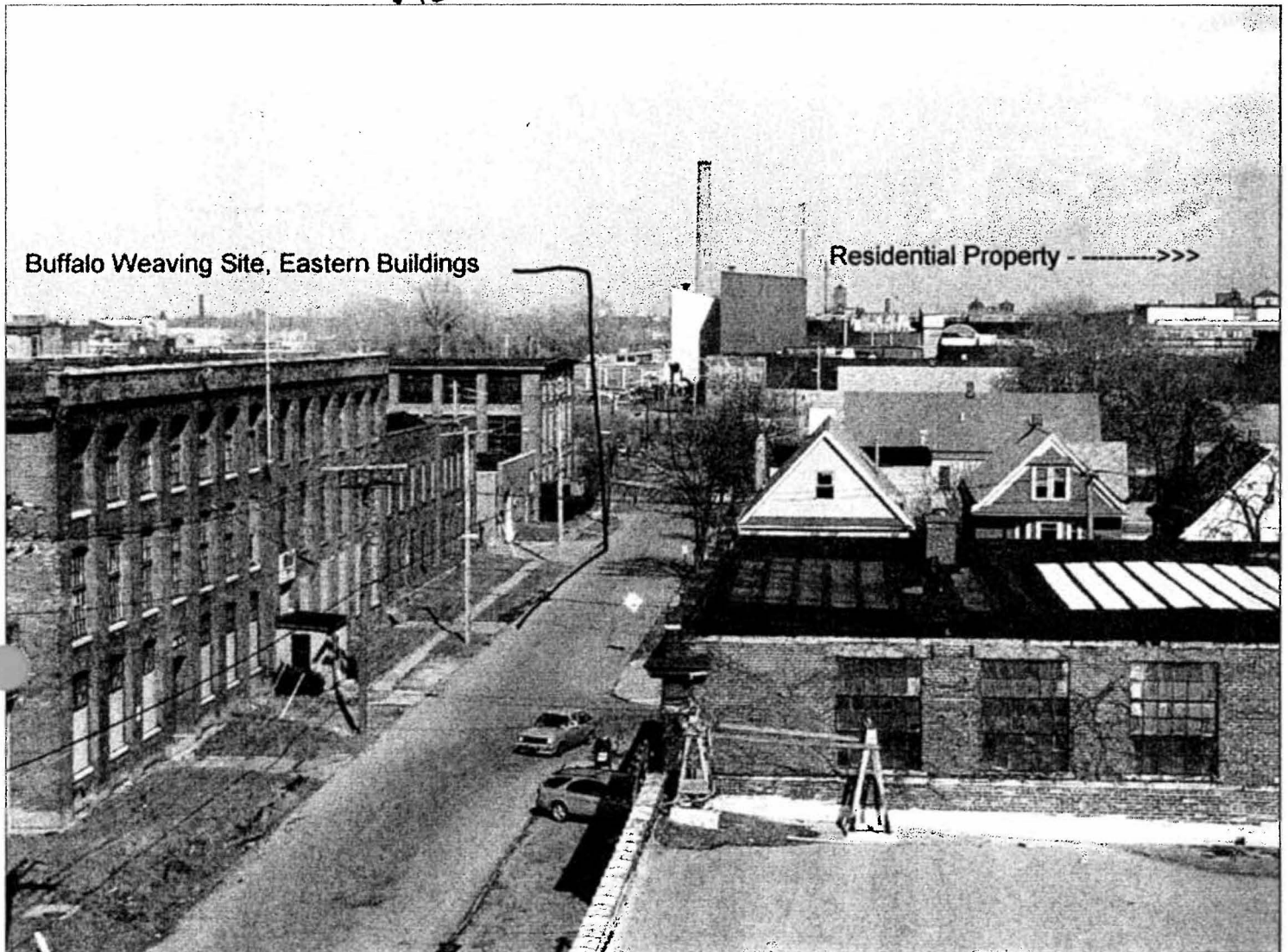


Figure 8
Buffalo Weaving Site
Site Photograph

VIEW LOOKING SOUTH

Buffalo Weaving Site
Proximity to Residences



Figure 9
Buffalo Weaving Site
Site Photograph

Attachment 5

Estimated Costs

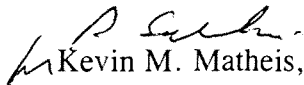
CONTAINS CONFIDENTIAL BUSINESS INFORMATION




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II
EDISON, NEW JERSEY 08837

DATE: APR 22 2003

SUBJECT: Request and Documentation for the Verbal Authorization for a Removal Action at the Buffalo Weaving and Belting Co., located in Buffalo, New York

FROM:  Kevin M. Matheis, On-Scene Coordinator
Removal Action Branch

TO: George Pavlou, Director
Emergency and Remedial Response Division

THRU:  Richard C. Salkie, Chief
Removal Action Branch

PURPOSE

The purpose of this Memorandum is to document a verbal authorization to initiate a removal action at the Buffalo Weaving and Belting Company Site, located at 204-260 Chandler Street, Buffalo, New York 14207. This removal action is in response to a request from the New York State Department of Environmental Conservation (NYSDEC) to EPA to perform an emergency response action at the Site. An extensive fire in a significant portion of the building complex occurred in the late evening of April 15, 2003. The fire was extinguished by April 16, 2003, leaving an unsecured, structurally unstable building. A recent inventory of the facility conducted prior to the fire by the mortgage holder, Buffalo Economic Renaissance Corporation (BERC), indicates the presence of approximately 100, 55-gallon drums containing potentially hazardous materials/substances including but not limited to oils, waste oils, hydraulic fluids, solvents, phenolic resins and unidentified cleaners. Inspections by NYSDEC staff conducted on April 17, 2003 indicate that some of the drums were not impacted by the fire, but are now unsecured and unprotected. Remnants of hazardous wastes/substances may also remain in the fire zone. In addition, an estimated 50 smaller containers of similar materials were on-site.

The site contains hazardous substances in an unsecured, fire-damaged building, therefore it is recommended that EPA provide site security and fence the damaged buildings. In addition, actions will be taken to remove fire-damaged debris from the buildings in order to access the hazardous substances contained therein. The project ceiling to begin the proposed actions is \$70,000, of which \$50,000 is for mitigation contracting.

BACKGROUND

The Buffalo Weaving and Belting Co. is comprised of a series of interconnected buildings at 204-260 Chandler Street, located in Buffalo, New York. The Site was most recently occupied by Phargo Electric Company, which ceased operations on January 17, 2003. Phargo Electric was shutdown by the BERC at that time. BERC had boarded and secured the buildings and recently prepared the inventory of hazardous substances.

As indicated above, the fire heavily damaged the central area of the interconnected Site buildings. Approximately 200 - 300 feet of the central portions of the building were destroyed by the fire. The City of Buffalo erected barricades along Chandler Street and behind the Site buildings as a temporary measure to prevent site entry.

PROPOSED ACTION:

This Verbal Authorization of Funding will be used to activate the Emergency and Rapid Response Services Contractor to immediately provide 24-hour security at the site and fence portions of the building. EPA will then begin to dismantle the Site buildings to access the hazardous substances and stabilize the site.

APPROVE:

John Fusco
George Pavlou, Director
Emergency and Remedial Response Division

DATE:4/28/03**DISSAPPROVE:**

George Pavlou, Director
Emergency and Remedial Response Division

DATE:

cc: (after approval is obtained)
G. Pavlou, ERRD-D
W. McCabe, ERRD-DD
R. Salkie, ERRD-RAB
J. Witkowski, ERRD-RAB
G. Zachos, ACM/O
R. Dease, ERRD-RPB
S. Kivowitz, ORC-NYSUP
B. Bellow, CD
C. Beasley, 5202G
R. Manna, OPM-FMB
C. Rudnick, NYSDEC
P. McKechnie, OIG
E. Christman, NOAA
A. Raddant, DOI
C. Kelley, RST

**DEPARTMENT OF PUBLIC WORKS,
PARKS AND STREETS
ROOM 512, CITY HALL
BUFFALO, NEW YORK, 14202**

STREET PERMIT

Permit # SO 2003-057

Permit Location CHANDLER STREET
between Manton Pl. and Bridgeman St.

Date 5/7/2003

This permit is issued subject to provisions of the City Ordinances, Chapter 413-37, Article V, and further approval by the Department of Public Works, Parks and Streets and must be left on the premises until work is completed.

Permittee US Environmental Protection Agency
Address 111 W. Huron St.
Buffalo, NY 14202

Owner Kevin M. Matheis 551-5946

Permission granted to occupy 240 **TOTAL** feet of space.
to close 120' of length on Chandler St. between Manton Pl. and Bridgeman St. to include entire R.O.W. for dismantling and demolition of fire damaged buildings during the week of May 12, 2003. Barricade and detour signage supplied by the City of Buffalo.

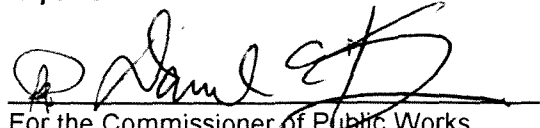
Permit Fee fee waived
gov-gov waiver
15¢ / Temporary Sign \$0.00

Date 1-May-03

Expires 1-Jun-03

Parking Meter Fee \$0.00

Total Amount Paid fee waived
gov-gov waiver


For the Commissioner of Public Works,
Parks and Streets

The Permittee is responsible for the maintenance and protection of traffic in accordance with the New York State Manual of Uniform Traffic Control Devices. Display Type B flashing high intensity warning lights (Yellow) on Material, Equipment and Objects in Street.



New York State Department of Environmental Conservation
Division of Environmental Remediation, 12th Floor
625 Broadway, Albany, New York 12233-7011
Phone: (518) 402-9706 • FAX: (518) 402-9020
Website: www.dec.state.ny.us

April 23, 2003

Mr. George Pavlou
Director
Emergency & Remedial Response Division
United States Environmental Protection Agency, Region II
290 Broadway
New York, New York 10007-1866

Dear Mr. Pavlou:

RE: Former Buffalo Belt & Webbing
Buffalo (C), Erie County

The New York State Department of Environmental Conservation (Department) hereby requests the United States Environmental Protection Agency (USEPA) perform an appropriate CERCLA emergency response action at the former Buffalo Belt and Webbing facility located at 204-260 Chandler Street, Buffalo, New York.

The facility consists of six large multi-story buildings, portions of which have been unused for several years. The remaining portions were used for the manufacture of rubber belting and webbing products through the end of 2002.

A large fire in a significant portion of the complex occurred in the late evening of April 15, 2003. The fire was extinguished by April 16, 2003, leaving an unsecured, structurally unstable site. A recent inventory of the facility conducted prior to the fire by the mortgage holder, Buffalo Economic Renaissance Corporation, indicates the presence of approximately 100, 55-gallon drums containing potentially hazardous materials/substances including but not limited to oils, waste oils, hydraulic fluids, solvents, phenolic resins and unidentified cleaners. Inspections by Department staff conducted on April 17, 2003 indicate that some of the drums were not impacted by the fire, but are now unsecured and unprotected. Remnants of potentially hazardous wastes/substances may also remain in the fire zone. In addition, an estimated 50 smaller containers of similar materials were on-site.

If you have any questions regarding this request, please contact Mr. Daniel King, of my staff, in Buffalo at (716) 851-7220.

Sincerely,

Salvatore Ervolina

for Dale A. Desnoyers
Director
Division of Environmental Remediation

cc: Dan King

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PUBLIC INFORMATION OFFICE
345 THIRD STREET, SUITE 530
NIAGARA FALLS, NEW YORK 14303**

**Buffalo Weaving and Belting Site (a.k.a PharGo LLC)
Buffalo, New York
UPDATE FACT SHEET**

May 2003

UPDATE as of May 6, 2003

EPA has fenced the site buildings damaged by the fire and is providing 24-hour security. EPA has set up offices at 207 Chandler Street. Plans call for the dismantling of site buildings and removal of hazardous materials contained therein. EPA will remove debris from the site buildings and send it for off-site disposal. All waste removed from the site will be sent to off-site disposal facilities that are licensed to dispose of the waste materials in an appropriate manner.

EPA has been conducting air monitoring on a daily basis and has found no releases of hazardous materials since EPA has been at the site. EPA will continue to be on-site and to direct and monitor progress of all cleanup operations. In addition, EPA will continue to conduct air monitoring during the removal operations to ensure that the work is performed safely.

Due to the need for dismantling the fire-damaged buildings, EPA will close a small section of Chandler Street for approximately 2 months beginning the week of May 12, 2003. This section of Chandler Street will be closed to vehicles and pedestrian traffic. EPA has notified the surrounding business and will accommodate truck access through Chandler Street as requested by the businesses. Road Closed signs and Detour signs will be posted by the City of Buffalo. EPA apologizes for any inconvenience that this closure presents. If you need to visit EPA's project trailer, please use the west entrance gate located on Chandler Street, near G&R Machine.

Background

The U.S. Environmental Protection Agency (EPA) began site operations on April 18, 2003, at the former Buffalo Weaving and Belting Site, located at 204 - 260 Chandler Street, Buffalo, New York. EPA has been requested to undertake a cleanup by the New York State Department of Environmental Conservation (DEC). The site was the location of the former Buffalo Weaving and Belting Company, and most recently, PharGo LLC. PharGo LLC closed in January 2003 and the Buffalo Economic Renaissance Corporation (BERC) had secured the buildings. On April 15 and 16, 2003, a fire destroyed some of the site buildings. This fire led to DEC's request for EPA to undertake a cleanup action.

If you have any questions concerning EPA's cleanup action, please contact Mike Basile, Public Affairs Specialist at EPA's Public Information Office located in Niagara Falls at 285-8842. If you prefer, please visit EPA's project trailer located at the site.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PUBLIC INFORMATION OFFICE
345 THIRD STREET, SUITE 530
NIAGARA FALLS, NEW YORK 14303**

**Buffalo Weaving and Belting Site (a.k.a PharGo LLC)
Buffalo, New York
UPDATE FACT SHEET**

June 2003

UPDATE as of June 9, 2003

EPA continues to dismantle site buildings and remove the asbestos and containers therein. As of June 9, 2003, EPA has removed 12 electrical transformers, 24 electrical capacitors, 100 linear feet of asbestos-coated piping, and over 150 containers (one-gallon to 55-gallon in size) of chemicals from the fire-damaged buildings. In addition, 32 trucks of demolition debris has been sent off-site for disposal. EPA continues to provide 24-hour security.

EPA has been conducting air monitoring on a daily basis and has found no releases of hazardous materials since EPA has been at the site. EPA will continue to be on-site and to direct and monitor progress of all cleanup operations. In addition, EPA will continue to conduct air monitoring during the removal operations to ensure that the work is performed safely.

EPA expects Chandler Street to be closed until August 2003.

EPA has created a web site with site documents, site photographs, and air monitoring information that can be accessed at www.epaosc.net/buffaloweaving.

If you need to visit EPA's project trailer, please use the west entrance gate located on Chandler Street, near G&R Machine.

Background

The U.S. Environmental Protection Agency (EPA) began site operations on April 18, 2003, at the former Buffalo Weaving and Belting Site, located at 204 - 260 Chandler Street, Buffalo, New York. EPA has been requested to undertake a cleanup by the New York State Department of Environmental Conservation (DEC). The site was the location of the former Buffalo Weaving and Belting Company, and most recently, PharGo LLC. PharGo LLC closed in January 2003 and the Buffalo Economic Renaissance Corporation (BERC) had secured the buildings. On April 15 and 16, 2003, a fire destroyed some of the site buildings. This fire led to DEC's request for EPA to undertake a cleanup action.

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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
PUBLIC INFORMATION OFFICE
345 THIRD STREET, SUITE 530
NIAGARA FALLS, NEW YORK 14303**

**Buffalo Weaving and Belting Site (a.k.a PharGo LLC)
Buffalo, New York
UPDATE FACT SHEET**

June 2003

UPDATE as of June 20, 2003

EPA continues to dismantle site buildings and remove the asbestos and containers therein. As of June 20, 2003, EPA has removed 12 electrical transformers, 24 electrical capacitors, 100 linear feet of asbestos-coated piping, and over 150 containers (one-gallon to 55-gallon in size) of chemicals from the fire-damaged buildings. These materials are being stored on-site until off-site disposal arrangements are coordinated. In addition, 39 trucks of demolition debris has been sent off-site for disposal. EPA continues to provide 24-hour security.

EPA has been conducting air monitoring on a daily basis and has found no releases of hazardous materials since EPA has been at the site. EPA will continue to be on-site and to direct and monitor progress of all cleanup operations. In addition, EPA will continue to conduct air monitoring during the removal operations to ensure that the work is performed safely.

EPA expects Chandler Street to be closed until August 2003.

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Rubber & Plastics News

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February 24, 2003

The Rubber Industry's International Newspaper

\$79 per year, \$4.50 per copy

Closing doors Alpha Associates to buy rest of Buffalo Weaving

By Mike McNulty

Rubber & Plastics News Staff

BUFFALO, N.Y.—Alpha Associates Inc. plans to purchase the remaining rubber business of 111-year-old Buffalo Weaving & Belting Co., which shut down its manufacturing facility Jan. 15.

The factory closed when its power was turned off, according to a union official. It has not re-opened, its employees have been laid off, their insurance coverage has lapsed and production is being outsourced.

Alpha Associates recently reached a tentative agreement with PharGo L.L.C., which does business as Buffalo Weaving & Belting, to acquire the firm's sheet rubber and specialty elastomer product lines, technology, customer list, various formulations, sales contracts and possibly its arrestor tape business,

according to Christopher J. Avallone, president of Alpha Associates. The deal will boost the firm's rubber product line significantly, he said.

In mid-2002, Alpha Associates bought the conveyor belt, fluoroelastomer sheeting, flue duct and high-temperature woven belt units

from Buffalo Weaving, which was formed in 1891 and purchased by John and Robyn Pharr in 1997.

The latest deal doesn't include Buffalo Weaving's 211,000-sq.-ft. plant or equipment.

Alpha Associates, headquartered in Woodbridge, N.J., has begun manufacturing Buffalo Weaving's products at its Charleston, S.C., rubber goods facility.

See Buffalo, page 2

A special section on
hose and belts begins on page 11.

West

Firms to boost

PHOTO: 6004

Buffalo

Continued from page 1

on a contract basis until the transaction is completed, probably within 60 days, Availone said.

After that Alpha Associates will move the acquired business permanently to its 120,000-sq.-ft. Charleston plant, where it will utilize Buffalo Weaving's proprietary product designs and formulas, he said. There it will be merged with the specialty conveyor belt and other rubber units, and a Buffalo Weaving & Belting division may be created, according to John Pharr. Alpha did not say if any current Buffalo Weaving workers would be offered jobs in Charleston.

News of the potential deal came from a United Steelworkers of America Local 246 official, who said Buffalo Weaving's owners laid off the plant's remaining 20 union employees when the facility's power was shut off

in mid-January. Pharr, president and CEO of the company, initially said a power failure shut the facility down. The plant has a total work force of about 25.

Rocco Orlando, president of the local and a 29-year employee of the company, claimed "the power was terminated for non-payment on Jan. 15, and that was the last day we worked there. He (Pharr) pulled the plug at about 1-1:30 p.m. that day. I was there when the power company came and pulled the breakers."

The utility company, Niagara Mohawk, said it doesn't give out information on power terminations.

Orlando also maintained employees recently received letters from Independent Health, the company's medical insurance carrier, stating that as of Nov. 30, 2002, coverage had been canceled because of overdue premium payments by the firm. The workers had not been aware of the insurance cancellation before the notification letter arrived, he said.

"I tried to contact him (Pharr) but couldn't," Orlando said.

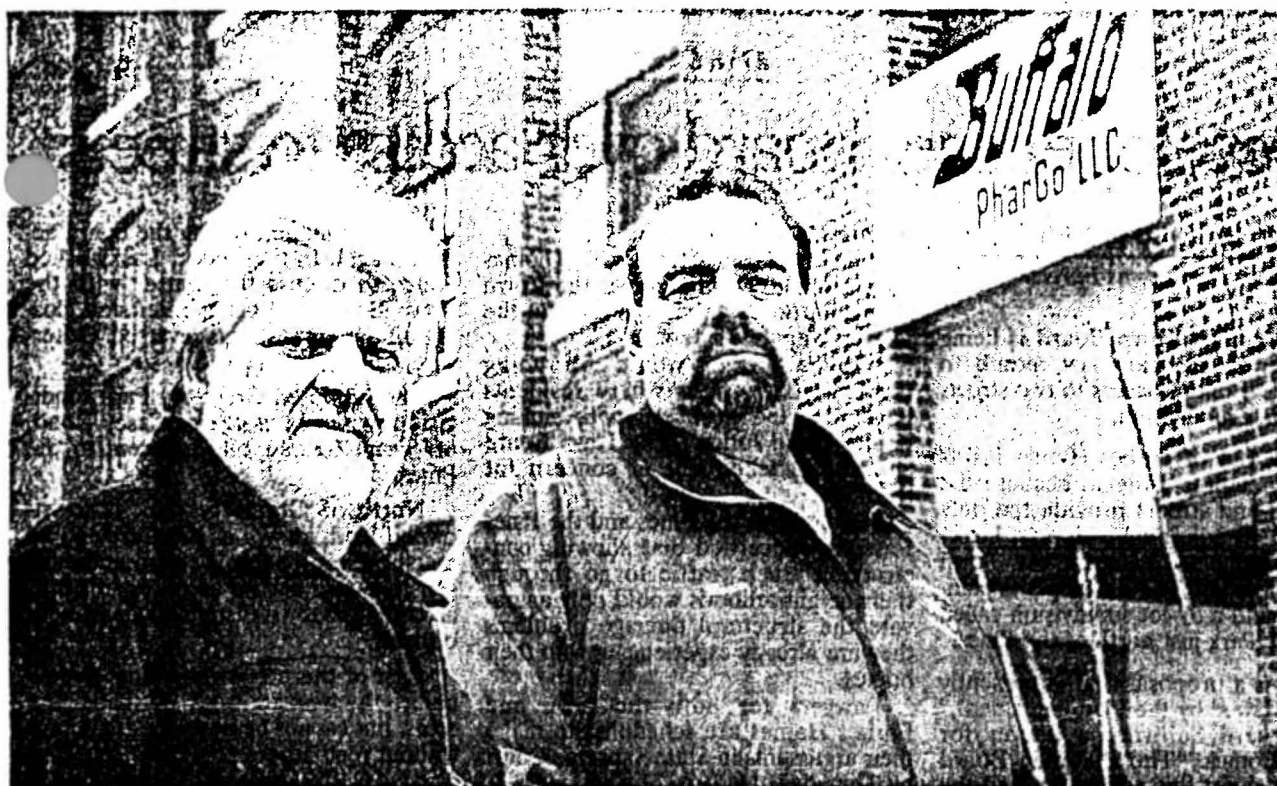
Buffalo Weaving continued to deduct medical payments from employees' checks after the insurance was canceled until the last checks they received in mid-January, he claimed.

Orlando said the factory has not been officially closed, and Pharr told the union president Jan. 15 the power would be off until the firm received further funding, and all employees would be laid off.

The union has not been officially notified that the plant is closing, "and (Pharr's) supposed to do that," he said.

"We are dead in the middle of selling parts of the company," Pharr said. "Everything else is rumor and nothing more. I won't comment on anything the union has to say. The offers we have are real and viable. We've had products shipped this month because we're outsourcing production. We had a power outage at the company that stopped us from production and so we decided to outsource production. The plant is (currently) not operating."

Buffalo Weaving's factory may be used for other investments, Pharr said, but he did not elaborate.



SHARON CANTILLON/Buffalo News

Mike Hooker, left, union VP, and Rocco Orlando, union president, worked for Buffalo Weaving for a total of 53 years.

Weaving a sad tale

*30 lose jobs
as 111-year-old
Buffalo company
ends operations*

By FRED O. WILLIAMS

News Business Reporter

A weaver of industrial belts has shuttered its Buffalo factory after more than 100 years in the city's Black Rock section, leaving 30 workers without jobs.

Buffalo Weaving & Belting Co. closed Jan. 15 when utility crews turned off the power, according to union president Rocco Orlando.

"Now all the medical bills are coming back unpaid" because of lapsed insurance, said Orlando, president of the United Steel Workers Local 246. "We've all faced the fact they're not going to re-

company owner John S. Pharr said a power outage caused production to shift to out-source producers. Buffalo Weaving is the doing-business-as name of Pharr's company, PharrGo LLC.



Buffalo News file photo

Charles E. Johnson, who was president of Buffalo Weaving when this picture was taken in 1975, holds nylon thread that is made into the large roll of "arrestor tape" in the background.

Pharr said he is in talks with potential investors, who will be key to whether the company reopens its doors. He declined to comment on unpaid medical insurance.

The business at 260 Chandler St. traces its origins to 1892, when it wove cotton harnesses for horse-drawn coaches. The company graduated to nylon and rubber products for auto and aerospace markets, including the first seat belts for aircraft, according to press reports of the time. Meanwhile the business passed from owner to owner, with Pharr buying the company in 1995.

Having employed 200 people in better times, the company has dwindled to about 30 jobs in recent years, Orlando said.

After the shutdown last month, workers got a second shock when the company's health insurer informed them that their policies were canceled for non-payment.

Tina Webster, executive secretary, had surgery for a thyroid problem in January. A few days later she learned her company-paid insurance had lapsed Dec. 31.

"As far as I knew we had full coverage," she said. "I don't know what (the

See Weaving Page B7

Weaving: Falsified inspection reports

BU10.6007

Continued from Page B4

operation) cost; I know I can't pay it."

The company makes a woven nylon belt called "arrestor tape" that catches Navy jets landing on aircraft carriers and jerks them to a halt. The belt is also used by the military at short landing strips.

Workers thought the current build-up of forces in the Persian Gulf would boost military orders.

"Much as you hate to say it, the war would've helped us," Orlando said.

While demand for its products continued, employees said, the company staggered under debts that contributed to its shutdown.

"Too much debt's a bad thing," Pharr said.

Buffalo Weaving owed about \$600,000 to GE Capital in the summer of 2000, when it sought an emergency loan from the city, according to the Buffalo Economic Renaissance Corp.

The city's development agency loaned the company \$250,000 — backed by its real estate and 240,000-square-foot plant — to save it from collapse, chief lending officer Marie Currie said.

"The loan's in trouble now," she said.

Payments stopped in May of last year, leaving an unpaid balance of \$243,000, Currie said. The city filed legal action, but didn't force the company's shutdown, she said.

Founded as Chase & Mathewson, the business adopted the Buffalo Weaving name in 1902, making belts and webs of woven cotton. When horse-drawn transportation ended, it shifted to supplying Buffalo's

fledgling auto industry. Among its early products were transmission linings for the Model-T Ford.

Then there were its more exotic products, such as webbing used with parachutes and harnesses used in Admiral Richard Byrd's polar expeditions.

The company grew under local owners until 1943, when it was bought by an investment group from Philadelphia.

Larry O'Neil, owner of another belt-making company in Easton, Pa., acquired Buffalo Weaving in the 1980s. O'Neil sold the company to Pharr in 1995, mostly for the assumption of the company's approximately \$500,000 debts, O'Neil said.

The company's greatest strength was its expertise with rubber products, O'Neil said. Its "switchboard mats" are used by corporations in high voltage areas, and it made a unique rubber conveyor belt for mining equipment.

"That belt could turn left and right — that expertise was attempted by such companies as Goodyear and Goodrich, (but) people were unable to make that belt," O'Neil said.

Buffalo Weaving sold the conveyor belt and associated equipment to a South Carolina manufacturer last year, Pharr said.

In 2001 Phargo LLC, the parent of Buffalo Weaving, was fined \$16,000 for falsifying inspection reports for landing belts it supplied to the military. The company pleaded guilty in federal court to falsely stating tests had been conducted in 1996 and 1997.

e-mail: fwilliams@buffnews.com

Opinion

Buffalo Weaving story sad and all too common

It's a shame, a crying shame, about what has happened at Buffalo Weaving & Belting Co.

Today the Buffalo, N.Y., business' plant is padlocked, workers laid off, some vendors unpaid. Owner John S. Pharr won't call it a game, continuing to say his business will reopen, a dream not shared by his former employees.

The plight of PharGo L.L.C.—the firm's actual name, while it does business as Buffalo Weaving—is not new to the rubber industry. Pharr had spent more than 26 years at Siegling America Inc., including a decade as president. When he and his wife got the opportunity to buy Buffalo Weaving, they took it.

Why not? Pharr knew the belting business, and he'd been successful. And for a time things worked, business was OK.

Then it all fell apart. Business slumped, revenue was insufficient. Pharr's workers, suppliers and creditors say bills weren't paid, payrolls not met on time. Even health and life insurance premiums weren't covered for employees.

Unlike during his Siegling years, Pharr didn't have a bigger parent that could help keep the operation viable. Things started spiraling out of control.

THE EDITOR'S VIEW

Staying alive

By Edward Noga

I felt the pulse of the rubber industry the other day. It's faint, but still throbbing.

The opportunity to see how the business is doing was provided by the Rubber Manufacturers Association, which held its annual

bility lawsuits, the executives often shrugged their shoulders and said, "What are you going to do?" World events, in which they have no influence, are controlling their companies' destinies.

The chief economist from the Chamber of Commerce was the most optimistic person pre-



Now he's sold or is selling the best parts of his business, and hoping to revive the operation.

A lot of people, including Pharr, have been hurt because of Buffalo Weaving's troubles. It's just a very sad, and all too common, occurrence in the rubber business.

QUOTE OF THE WEEK

"It seems like almost a whorish attempt to take advantage of the supply base."

—Jeff Mengel, Plante & Moran L.L.P., on Visteon's move to get suppliers to pay upfront to win contracts.

FROM THE RPN ARCHIVES

25 years ago—March 6, 1978

The National Highway Traffic Safety Administration begins investigating reports in the *Fire*—700 steel-belted



BUFFALO WEAVING:

Shutdown hurts workers

By Mike McNulty

Rubber & Plastics News Staff

BUFFALO, N.Y.—Norm Kohlbrenner, Chester Jaskowiak and Tina Webster lost more than jobs when the doors closed Jan. 15 at Buffalo Weaving & Belting Co.

They, like other company employees, claim to have discovered a short while later they owed money on bills they never knew they had because the firm stopped paying for medical coverage in November. That left employees without coverage in December and January.

Worse yet, the employees said, the company did not inform them and continued to take medical deductions from their paychecks.

President and CEO John S. Pharr repeatedly has refused to comment on employee allegations. He did say some statements being attributed to him by workers aren't true, but he won't be more specific.

Webster, who had worked for the firm for six years as Pharr's executive secretary, said she thought she had medical coverage when she went into the hospital three days after the plant closed to have her thyroid removed. She said Pharr told her that the layoff had been temporary. In February, Independent Health, the insurance carrier, informed employees they hadn't had coverage since Nov. 30 because of overdue premium payments.

Now she's concerned about how she'll cover her medical bills that could run more than \$20,000. She said she contacted Pharr "and he said he'd take care of the bill for me and the expenses I had. But that's a verbal agreement, so I don't know if it will happen."

Kohlbrenner, a 26-year employee of the firm, said Buffalo Weaving owes him about \$1,300 for medical expenses incurred during the period coverage had been dropped. "My wife was going to the doctor thinking we had medical coverage. I don't care what he does now, as long as he reimburses me. I'm upset with him. A lot of us are."

He said he talked with Pharr three weeks ago and was told by the owner that he would be reimbursed for the medical bills and the money deducted from his pay.

Jaskowiak said he's due a reimbursement on pre-

scriptions that he thought were being covered under the medical plan. But he has a bigger issue than that with the company.

The 41-year Buffalo Weaving employee lost he wife, Mary Jane, to illness in August and he's still waiting for the final payment on a life insurance policy the firm carried on her, which was part of a union agreement. But apparently because of administrative reasons, the policy was not in effect when his wife died, he said.

Jaskowiak, who started out as a pressman in the early 1960s before becoming a compounder, has been battling the company over the life insurance payment since he returned to work after the funeral for his wife, who worked for the firm for 28 years.

"I was told by the personnel manager that the policy had been canceled," he said. "I approached Pharr and he said he had no money to pay for the policy but that he would come up with a payment plan."

The company owner did give him \$3,000 shortly thereafter to help cover funeral expenses, according to Jaskowiak, and he also put a payment plan together.

However, the firm did not make the payments, he said, so the internal mixer operator refused to work Oct. 1 until he was paid.

The United Steelworkers of America became involved and by Oct. 15 both sides signed off on another payment plan. That schedule was not adhered to, either, Jaskowiak said, and Buffalo Weaving still owes him \$4,075.

All three figure Buffalo Weaving has closed its doors for good, although no official announcement has been made by company executives.

Webster said she's looking for work but the job market is tough. "I'm competing with 150 other people for one job."

Jaskowiak is planning to retire.

Kohlbrenner isn't looking for a job, because he has a small business, Norm's Auto Repair, to fall back on.

"I've worked two jobs all my life," he said. "I'm 52 and I usually put in 12-hour days. I enjoy working. This (auto repair business) was more of a hobby before. Now it's my job."

BUFFALO WEAVING: *End of an Era?*

Company veteran weathers good, bad times

By Mike McNulty

Rubber & Plastics News Staff

BUFFALO, N.Y.—Rocco Orlando knew deep down the day was coming. He just refused to believe it.

Orlando, one of the last 15 union members who lost their jobs when Buffalo Weaving & Belting Co. suddenly closed its doors in January, said signs the firm was in deep trouble had been there for some time.

But the company somehow kept bailing and was able to survive during tough times, so he figured it would happen again. "I was wrong."

Married and the father of two grown children, the 50-year-old Orlando stayed at the Buffalo-based company for 29 years "because I enjoyed working there. I wasn't even looking for another job. I guess I

knew this day was going to come but I was always hoping it wouldn't. I figured if it happened, I'd worry about it then."

"Then" has arrived and "now I'm collecting unemployment—which, believe me, is something I don't like doing," said Orlando, who is president of United Steelworkers of America Local 246, which represented most plant workers. "But the job market is tough now—especially in Buffalo."

His wife Anne Marie is working but they have no health insurance.

"I guess we'll have to pay big bucks for that, but you have to have it," he said.

An unpaid volunteer fireman for the town of Tonawanda, Orlando maintains



Rocco Orlando

poor management did the company in.

The firm's most recent misfortunes were a contrast to the company Orlando joined as a bench hand almost three decades earlier. The company had a work force of close to 200 operating out of its 211,000-sq.-ft. manufacturing facility, Orlando said.

"When I started there, it was a real good company," he said. And it remained that way for the next 20 years. "It was a solid place to work—at least until they started switching owners."

Near the end, with the handwriting on the wall and a staff of about 15 production workers on hand to make products, Orlando said he still refused to give up.

"I was the only maintenance man still there at the end," he said, "so I did it all or called someone in if I couldn't handle the job."

The company had weathered some

tough times during the last century, he said, especially in the mid-1990s when the owner at the time, Lawrence W. O'Neill, moved Buffalo Weaving's profitable latex-coated arrestor tape business to Victor Balata Belting Co. in Easton, Pa., another company he owned and the parent of Buffalo Weaving at the time.

O'Neill then sold Buffalo Weaving to John S. Pharr and his wife, Robyn Glemby-Pharr, in 1995.

"Once Pharr got here, it took us a year or two to get our arrestor tape business going again," Orlando said. "And when we had our old product (along with its rubber belt, switchboard matting, oil tank seals and sheet rubber businesses), we started to improve."

But the firm's fortunes shifted again in the last three years and the company was unable to rebound, according to Orlando.

End of an Era?

Pharr holds on

By Mike McNulty

Rubber & Plastics News Staff

BUFFALO, N.Y.—John S. Pharr doesn't want to let go.

He had great aspirations when he created PharGo L.L.C. to purchase Buffalo Weaving & Belting Co., Jan. 30, 1995, from Victor Balata Belting Co. Buffalo Weaving had performed poorly for much of the 1990s prior to the acquisition, but he was confident he could turn it around.

And he did for a while. But ultimately it didn't pan out. Financial difficulties apparently halted Buffalo Weaving's growth and Pharr has been selling parts of the firm since September 2002. The company's production plant was shut down Jan. 15.

Despite that, Pharr said Buffalo Weaving has not officially closed its doors for good and he's not selling off all of his company. Alpha Associates Inc. is buying some segments, but he insists he still owns parts of the business and may do something with them. While not disclosing his plans, he indicated it may involve switchboard matting, a product two employees said Buffalo Weaving stopped making in November.

Pharr won't comment on allegations made by laid-off employees several times over the last two weeks. He did say he is distressed because he claims some charges are false or misleading.

The president and CEO said the company currently is outsourcing production to Alpha Associates, which bought product lines and machinery from Buffalo Weaving last year and currently is negotiating to purchase other segments of the firm.

When Pharr entered the picture in 1995, it was a different story. He brought with him a good deal of knowledge about the company and a number of growth plans.

Pharr had worked with Siegling America Inc. for 26 years, serving as president from 1983-93. He oversaw development of its first U.S. conveyor belt manufacturing facility shortly before resigning. He was vice president of both Victor Balata and Buffalo Weaving for a short time in 1994 before he left to form PharGo.

His initial plans for Buffalo Weaving included restarting weaving and urethane-coated arrestor tape production; rebuilding the firm's petroleum tank seal manufacturing base; expanding its sales force; and entering new markets.

the plant, which produced...



JOHN C. HICKEY/Bufalo News

Three-alarm fire in Black Rock

Firefighters manning aerial ladder trucks late Tuesday pour water on a roaring fire consuming the old Buffalo Weaving & Belting Co. manufacturing facility on Chander and Bridgeman streets in Black Rock. The fire, which had reached three-alarm status by late Tuesday, broke out shortly after 10 p.m. Hazmat crews were reportedly headed to the fire because of concerns about chemicals stored at the site. Buffalo Weaving & Belting, which manufactured belts used by industry, closed its doors on Jan. 15 after more than 100 years, leaving 30 workers jobless. The business traced its origins to 1892, when it wove cotton harnesses for horse-drawn coaches.

Two charged with arson in fire at vacant Black Rock plant

By JAY REY

News Staff Reporter

Two young men are accused of setting the fire Tuesday that caused \$1.5 million damage to the old Buffalo Weaving & Belting Co. plant in Black Rock.

Investigators have charged Roger D. Scroggins, 19, of Grote Street, and Steven Pollard, 19, of Germaine Street, with setting Tuesday's three-alarm blaze

at 260 Chandler St.

Detective Brian Mahoney and Fire Investigator James O'Neill said Scroggins and Pollard entered the old industrial complex through an unlocked door and tossed lighted paper onto wooden pallets, triggering an inferno that gutted the building.

Scroggins and Pollard also were charged with second-degree criminal mischief and third-degree burglary. In addition, Scroggins faces a charge of petit larceny for allegedly stealing a metal detector from the building.

Further information on the arrests was unavailable Saturday.

The blaze started about 10 p.m. Tuesday. Firefighters were confronted immediately with an intense fire consuming at least two of the buildings in the multiple-structure complex, which once manufactured industrial belts.

The company closed Jan. 15 after 111 years at the Chandler Street site. The business had opened in 1892, making belts and webs of woven cotton for horse-drawn coaches.

When transportation progressed

from horses to automobiles and airplanes, the company shifted to nylon and rubber products, including transmission linings for the Model-T Ford and the first seat belts for aircraft.

Most recently, the company had been owned and operated by John S. Pharr and did business as PharGo. It manufactured a woven nylon belt called "arrestor tape" that is used to catch military jets landing on aircraft carriers and short landing strips.

e-mail: jrey@buffnews.com

4/22/07

ENVIRONMENT

No hazards found in first tests at fire scene

By VANESSA THOMAS

News Staff Reporter

Preliminary tests at the site where a three-alarm blaze gutted a former manufacturing plant in Black Rock last week have not detected any hazardous chemicals, radiation or dust in the air, but more tests are scheduled, Environmental Protection Agency officials said.

The blaze — which began at about 10 p.m. last Tuesday and continued into Wednesday morning — caused \$1.5 million damage to the old Buffalo Weaving & Belting Co. plant at 260 Chandler St.

The fire consumed at least two of the buildings in the multistructure complex, which once manufactured industrial belts. Two 19-year-old men were charged with intentionally setting the fire.

EPA on-scene coordinator Kevin Matheis said Monday that the chemical waste cleanup being conducted at the site is expected to last for the next two

"We haven't detected any environmental problems associated with the fire so far."

**Kevin Matheis, EPA
on-scene coordinator**

months.

During this time, the air quality will be periodically tested. Asbestos test results are expected Thursday, he said.

"We haven't detected any environmental problems associated with the fire so far," said Matheis. "No contaminants were found in the air when we tested for volatile organic chemicals, radiation and hazardous dust."

About 100 drums filled with methyl ethyl ketone, toluene and machinery oils, lubricants and cleaners were believed to be at the site during the blaze.

Authorities said they are unsure how many drums were destroyed and what chemicals were released.

Methyl ethyl ketone and toluene — common industrial solvents that are extremely flammable — are considered the most hazardous of all the chemicals that officials believe were present at the fire scene, he said.

EPA officials said their short-term effects can include eye or skin irritations. According to the EPA, there is no information available about their long-term or carcinogenic effect on humans.

"We're here to protect the community and the citizens," said Matheis. "We will continue to keep residents informed about our cleanup efforts."

About 30 to 40 homes are located within 100 yards of the burned-out plant. A public information session for concerned citizens will be held later this week, but no date or place has been set, he said.

The EPA has fenced around the damaged buildings and is providing 24-hour security.

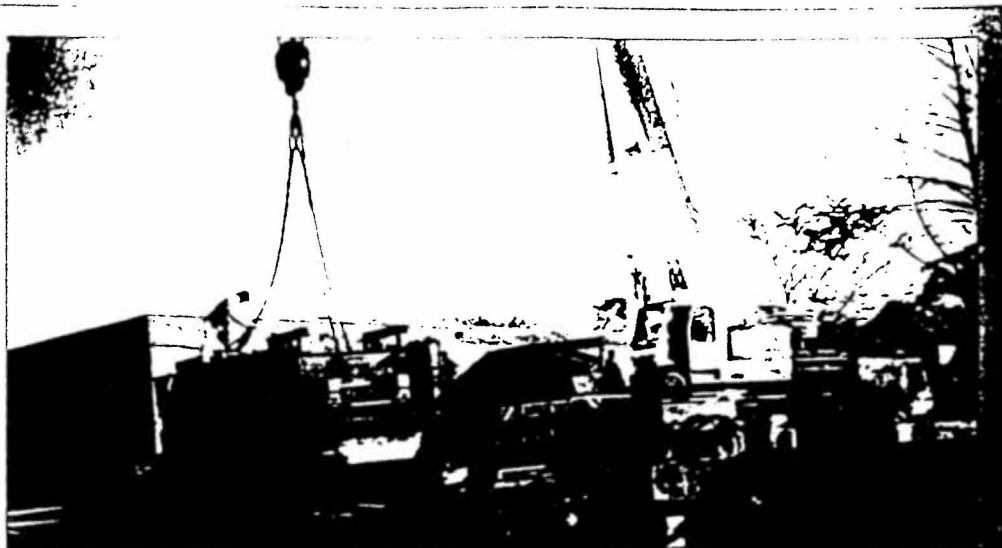
Workers are currently hauling in equipment and setting up the area to begin their waste cleanup.

In about two weeks, workers are scheduled to start dismantling the buildings and assessing the condition of the drums to ensure their safe removal, said Matheis.

All removed waste will be sent to an off-site disposal facility.

e-mail: vthomas@buffnews.com

Right, a worker secures a 24-foot-long Almex press used to produce a unique mining belt before it's shipped to Alpha Associates Inc. in New Jersey. Alpha purchased the belt operation and machinery in September. Below, a forklift moves a press to Buffalo Weaving's dock in preparation for the transfer. See page 10 for more stories.



Caught in a revolving door

Cash flow spurs Buffalo Weaving troubles

By Mike McNulty

Rubber & Plastics News Staff

BUFFALO, N.Y.—PharGo L.L.C., doing business as Buffalo Weaving & Belting Co., spent at least a year trapped in a vicious circle that ultimately caused it to cease production Jan. 15.

That's the picture painted by employees laid off at the battle-scarred, 111-year-old company, which has been shut down but not officially closed. However, the plant has been padlocked because the firm failed to make payments to a lender, according

to Buffalo Economic Renaissance Corp., which holds the mortgage



on the building.

Laid-off employees insist Buffalo Weaving's factory has been closed permanently for more than a month, but its owner, John S. Pharr, has refused to make it official. They're upset with him for the way he's handled that and other matters.

Pharr, who purchased the firm in 1995 and serves as president and CEO, claims he has not closed the facility's doors for good—that production has only been suspended and there is no

See Money, page 10

Money

Continued from page 1

fixed date for it to be resumed." He said he is in the process of selling some of the remaining segments to Alpha Associates Inc., but not the entire company.

Workers claim Buffalo Weaving quit making health insurance payments in late November, even though employee deductions were taken from their checks weekly, and they didn't know until the health insurer sent cancellation letters two months later.

Union-negotiated, company-paid life insurance policies also were canceled, employees maintain. One worker said he didn't learn about it until shortly after the death of his wife, a longtime company employee.

Workers claim parts of the plant's roof sagged and they often worked the last few months without heat in the factory. The machinery was old, broken down and needed repairs, several said.

As one supplier put it, "John has been scrambling for a long time and I guess he just ran out of moves."

Money problems

The root of Buffalo Weaving's dilemma seems to be money, or lack of it, which created a circle of other problems.

Workers charge the owner often didn't pay his bills, which stopped the flow of

needed materials and compounds into the plant, which prevented the company from producing products, which reduced the amount of money coming into the company to pay bills.

Failure to make payments to vendors put the firm in a hole, according to Tina Webster, Pharr's former executive secretary.

"He wanted \$40,000 a week in product going out the door (to cover payroll,



Buffalo Weaving's 211,000-sq.-ft. plant spans three blocks.

utilities and other bills)," she said. "But sometimes we didn't pay for the compounds or pay the vendors in 30 days. So we had to manipulate every which way to get raw materials. There were all sorts of letters of intent to pay going out."

The firm fell behind in orders because it couldn't pay for compounds, and without them it couldn't make some products, said Chester Jaskowiak, a 41-year employee who worked as a compounder on an internal mixer in the company's rubber department.

"The problem with payments goes back as far as I can recall," said Webster, who has been with the firm for six years. "We've always been behind."

Akron-based HB Chemical Corp. was one of several suppliers that attempted to be creative in dealing with Buffalo Weaving to help it keep going. HB Chemical supplied a variety of materials to the firm for about 15 years.

"They owed us money, and still do, for polymers and accelerators," said Jeff Rand, vice president of sales, although he noted that HB Chemical played a minor role with Buffalo Weaving compared to many other suppliers. "We really went out on a limb for them" and created different ways to deal with the company's payment problem. But it ultimately replaced debt with more debt, he said.

The same held true for paychecks, according to Rocco Orlando, a 29-year employee of the company and president of United Steelworkers of America Local 246. "Payday was Friday, then it went to Monday, then to Tuesday, and then we were two weeks behind and back to Friday," he said.

In the middle of 2002, some paychecks bounced, Orlando claims, "but he (Pharr) made good on them and also paid the bank charge."

Growing debt

Buffalo Weaving was burdened with more debts than it could handle, Webster and Orlando allege. In mid-2000, it

got an emergency \$250,000 loan from the city of Buffalo's development agency Buffalo Economic Renaissance.

Pharr used his 211,000-sq.-ft. plant, which spans three blocks, as collateral. Payments stopped in May 2001, according to published reports, leaving an unpaid balance of about \$240,000. Buffalo Economic Renaissance padlocked the factory in late February.

"We loaned him money to bail him out and save jobs," said Marie Currier, chief lending officer for the development agency. She said the agency likely will foreclose on the factory and put it up for sale.

In December and January, there were days when employees worked without heat because the firm didn't want to spend money to put boilers on. Orlando said.

"The only time the power went out at that time was if the company needed it for certain machines for production," he said. "We thought we could keep going, so the women worked with their coats and gloves on. It was so cold, you could see your breath in the place. But we were dedicated; we knew he was behind with the arrestor tapes (a urethane-coated product used by the U.S. military and NATO countries to slow down or stop aircraft on short runways), and we wanted to make it work."

The firm's gas was turned off more than a year ago, Webster said, and it was running on oil.

"We had heat maybe three days a week if we were lucky and the rest of the

See Money, page 1

BUF-FO-5016

Money

Continued from page 10

time we used little electric space heaters and worked with our coats and gloves on," she said.

Other woes

The company's troubles were not all money related.

In 2001, PharGo was charged with falsifying reports for tests conducted in 1996 and 1997 for the landing tape.

The firm pleaded guilty to the charges in federal court and was fined \$16,000. Buffalo Weaving was put on probation and continued to get orders from the U.S. government.

The company also lost a strong marketing and sales tie when a venture between the firm and Sampla Belting S.p.A. ended almost as quickly as it started.

Milan, Italy-based Sampla had rented space at the firm's Buffalo facility, fabricating and marketing its belts from the site along with some Buffalo Weaving belts. Then Sampla suddenly opted to move to another building in Orchard Park, N.Y.

Neither firm gave reasons for the venture's dissolution, and Sampla officials did not return repeated calls.

"Sampla had a sophisticated sales and

marketing department and they were an asset to Buffalo Weaving," according to Lawrence W. O'Neill, the previous Buffalo Weaving owner who sold the company to Pharr and his wife, Robyn Glemby-Pharr. "There's no doubt that Pharr lost a strong marketing and sales ally when Sampla left."

Orlando agreed, maintaining that the split hurt because Sampla "could have brought in more business for us."

'Niche oriented'

In September, Pharr sold the firm's specialty conveyor belt, fluoroelastomer sheeting, flue duct and high-temperature aramid woven belt businesses, along with an assortment of equipment, to Woodridge, N.J.-based Alpha Associates.

The sale left Buffalo Weaving with some rubber sheeting, molded rubber products, arrestor tape and specialty items. After the sale, Pharr said the company was adopting a simpler philosophy and becoming more niche oriented. The landing tape business, which made up 50 percent of the firm's business, had become his top product.

"We did it to reduce the amount of raw material items we require and make better use of equipment we've got," he said in December. "During the course of the last several years we've evolved to producing too many products. So by cutting parts of the business, we reduce

overhead without reducing sales of the businesses we retained." He said Buffalo Weaving also cut overhead by outsourcing mixing and calendaring.

Despite Pharr's optimism, the company didn't gain ground, according to employees.

Buffalo Weaving still couldn't keep up



A burlap covered mining belt is loaded to be shipped out of Buffalo Weaving's factory.

with its bills and materials weren't arriving at the plant in a timely fashion. The firm continued to fall behind on orders, they said.

Jaskowiak said Buffalo Weaving laid off about 12 workers in late November, even though it was behind on orders. That left the firm with a union work force of about 15.

In the dark

The plant officially went dark Wednes-

day, Jan. 15, when the local utility company, Niagara Mohawk, shut the power off to the facility. Orlando said Pharr told him he was trying to arrange for more financing and he expected the factory would be operating again by the week of Jan. 20.

The power never came on again.

By mid-February, as former employees began to raise concerns about the company's future, Alpha said it had reached a tentative agreement with PharGo to acquire the firm's specialty rubber and specialty elastomer product lines, technology and customer list, various formulas and sales contracts.

Pharr said the company was considering buying its arrestor tape business but Alpha did not confirm that. The deal did not include PharGo's factor remaining machinery and some

small product segments. The transaction is expected to close in 30 days.

Regarding the factory, "nothing has been finalized yet," Pharr said.

While the facility has been padlocked and the sale of most remaining product lines seems imminent, the union still has not been informed that the company has stopped operating.

However, Orlando said, a meeting slated for the week of March 10 between the union and Pharr that may resolve the issue.

111-year-old firm spans horse-drawn age to space age

BUFFALO, N.Y. Buffalo Weaving & Belting Co. has led a rich and colorful history, outfitting everything from horse-drawn carriages and buggies to parachutes borne down by airborne troops in World War II to space-age equipment.

The company, which began operating in 1891 in a 100-sq-ft plant in Buffalo, started out as a manufacturer of cotton woven belts lined with rubber. It expanded its product base to include webbing and saddle making with transmission band linings for Ford and other automobiles and sports equipment in the 1920s.

John C. Merriam purchased the company in 1943, taking it through the remainder of World War II and the 1950s, years when Buffalo Weaving manufactured and supplied the U.S. military with parachute harnesses. The firm also specially designed the dog sled harness used by Admiral Richard E. Byrd on his first land trek to the South Pole.

The company was one of the pioneer weavers of syn-

thetic yarns, which later resulted in the development of the automotive seat belt and other goods.


Richard Heiniger took over as president of the firm in 1962 when Merriam became chairman. Heiniger died in 1974 and Charles E. Johnson assumed the presidency in 1975. During this period, Buffalo Weaving began making rubber sheeting for gaskets. Later the company's sheet rubber packing was used on equipment during the Apollo moonwalks.

Easton, Pa.-based Victor Balata Belting Co. acquired the firm in the 1980s. "It was a very inventive company



In earlier times, John S. Pharr (far left) takes part in one of Buffalo Weaving's annual picnics.


that came out with a lot of new products," said Lawrence W. O'Neill, president of Victor Balata. He sold Buffalo Weaving to John and Robyn Pharr in 1995 because "I had a strike with textile workers going on at Victor Balata, which lasted a year."



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Black Rock Fire: Arrests Made; Dangers Assessed

by Patricia Abbato

Roger Scroggins of Grote St. and Steven Pollard of Germaine St., both 19, are accused of setting off a three-alarm blaze that caused \$1.5 million in damages to the PharGo building at 260 Chandler Street.

Buffalo fire investigator James

suspicious young people leaving the area on bikes very shortly after the blaze broke out.

"The investigation continues with the chance of more arrests possible," Deputy Fire Commissioner Margaret Keane told the *Review* on Tuesday. She wouldn't speculate on when the 111-year-old structure would be demolished.

"They still have cleanup to do," she said. The cleanup is expected to last at least two months, according to Kevin Mathias, site coordinator for the EPA.

The PharGo Company, which closed Jan. 15, manufactured woven nylon belts used to catch military jets landing on aircraft carriers and landing strips. The combination of chemicals inside the building couple with oil-saturated floors made it a virtual tinderbox. Fire fighters briefly considered evacuating residents and called in a hazardous material team to evaluate the situation as black smoke and fire shot into the night skies.

The EPA was requested to undertake a cleanup by the NYS Dept. of Environmental Conservation (DEC). An inventory prior to the fire revealed the presence of about 100 drums of chemicals. Some of

the drums contained methyl ethyl ketone, toluene, machinery oils, lubricants and cleaners. The EPA isn't sure how many of the drums were destroyed in the massive fire since not all of the interconnected building was consumed. During the cleanup, the EPA will carefully dismantle the buildings to assess the condition of the drums and ensure their safe removal. The EPA has contracted with the WRS Company in Syracuse.

Amy LaFave of Bridgeman St. is concerned about the health risks of possible air contaminants. Her five-year-old son, William, has asthma.

"I just have concerns for the kids and elderly people in our neighborhood. If there are any chemicals in the air what can it do to them and us?" she asked.

Analysis of the air began on Tuesday. According to the EPA site coordinator Kevin Matheias, there's no evidence of volatile organic chemical contamination outside of the PharGo building. The prevailing wind the night of the fire was away from the residential homes so it's unlikely anyone would experience an exacerbation of asthma or other lung disorders unless they were right next to the drums.

Radiation monitoring, which is normal in situations like this, also came back negative. There were no unusual dust particles either. Nothing hazardous has been found in the firefighting sewer water. The EPA suspects there may be asbestos

pipings.

"It's as stable as it can be," Matheias said.

The Chandler St. building was burglarized several months ago and neighbors claim that it became a popular site for kids to drink and party. The front and back of the build are being guarded by security officers 24-hours a day and

fencing has been set up to keep curiosity seekers away.

If you have any questions concerning EPA's cleanup actions, please contact Mike Basile, Public Affairs Specialist at the EPA Public Information Office at 285-8842 or visit the EPA project trailer on Chandler Street.



260 Chandler St. under EPA investigation for hazards.

O'Neil and detective Brian Mahoney arrested the teens and charged them with criminal mischief and burglary. Rogers faces an additional charge of petit larceny for snatching a metal detector from the building.

Scroggins and Pollard allegedly entered the old, multi-structured Buffalo Weaving & Belting Co. plant through an unlocked door, lit a piece of paper and threw it onto wooden pallets last Tuesday night. The teens were arraigned in Saturday and released from the County Jail on \$10,000 bail each.

Police are still searching for the teens who were seen leaving the

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Amherst](#)

Friday: [Genesee Community](#)

Breaking News

13:17 EDT Tuesday

Buffalo defense contractor pleads guilty to charge

PharGo Limited Liability Corp., which does business as Buffalo Weaving and Belting Co., has issued a guilty plea on a misdemeanor count of making false certifications to the U.S. government.

The defense contractor entered the plea before U.S. Magistrate Hugh Scott and now faces a penalty of five years probation and a fine of \$200,000, or both.

The U.S. Attorney's office said the company submitted writings which intentionally and falsely represented that a "loop" test, which is required under U.S. defense contracts, had been performed on arrestor tapes manufactured by Buffalo Weaving and Belting Co.

Arrestor tapes are high strength, expensive textile belts used in conjunction with cables in stopping the landing of military aircraft on aircraft carriers or runways.



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